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

Mexico Pacific Limited LLC

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Docket No. 18-70-LNG

**APPLICATION OF MEXICO PACIFIC LIMITED LLC FOR AN AMENDMENT TO
EXTEND THE DEADLINE FOR COMMENCEMENT OF EXPORT OPERATIONS
AND REQUEST FOR EXPEDITED ACTION**

June 18, 2025

Communications regarding this application should be directed to:

James F. Bowe, Jr.
King & Spalding LLP
1700 Pennsylvania Avenue, NW, Suite 900
Washington, DC 20006
Tel: +1 202 626-9601
jbowe@kslaw.com

Tyler R. Brown
King & Spalding LLP
1180 Peachtree Street, NE
Suite 1600
Atlanta, GA 30309
Tel: +1 404 572-2809
trbrown@kslaw.com

**UNITED STATES OF AMERICA
DEPARTMENT OF ENERGY
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Mexico Pacific Limited LLC

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**APPLICATION OF MEXICO PACIFIC LIMITED LLC FOR AN AMENDMENT TO
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AND REQUEST FOR EXPEDITED ACTION**

Pursuant to Section 3 of the Natural Gas Act of 1938, as amended (“NGA”)¹ and Part 590 of the Department of Energy’s (“DOE”) regulations,² Mexico Pacific Limited LLC (“MXP”) hereby submits this application (“Application”) to the DOE Office of Fossil Energy and Carbon Management (“DOE/FECM” or “DOE/FE”) for an amendment to DOE Order Nos. 4312 and 4312-A to extend the deadline established in Docket No. 18-70-LNG for commencement of MXP’s export operations to December 14, 2032. MXP submits that good cause exists to grant the requested extension, and respectfully requests that DOE/FECM approve this Application on or before August 1, 2025.

In support of this Application, MXP states as follows:

I. EXECUTIVE SUMMARY

MXP is filing this Application in connection with its continuing development of a liquefied natural gas (“LNG”) production and offtake facility located in the State of Sonora, Mexico (the “Saguaro Energía Facility” or “Facility”). Once completed, the Saguaro Energía Facility will be capable of receiving, processing, and liquefying natural gas, storing the resulting LNG, and loading

¹ 15 U.S.C. § 717b (2012).

² 10 C.F.R. Part 590 (2024).

LNG onto oceangoing LNG carriers for re-export to other countries and, potentially, for delivery to markets elsewhere in Mexico.

In 2018, MXP sought,³ and was granted, authorization to export up to the equivalent of 621 Bcf/year of U.S.-sourced natural gas to Mexico for end use in Mexico and/or, after liquefaction in Mexico, by vessel in the form of LNG from the proposed Saguaro Energía Facility to countries with which the United States has in place a Free Trade Agreement calling for national treatment for trade in natural gas (“FTA nations”)⁴ and to countries with no such Free Trade Agreement (“Non-FTA nations”).⁵ As amended, MXP’s export authorization in Docket No. 18-70-LNG extends through December 31, 2050.⁶ In Order No. 4312, DOE/FE conditioned MXP’s authorization to export LNG to Non-FTA Nations on MXP’s commencement of “re-export operations using the planned liquefaction facilities no later than seven years from the date of issuance of this Order,” *i.e.*, December 14, 2025.⁷

Since receiving its export authorization in this proceeding, MXP and its various affiliates and subsidiaries have, in good faith, made significant and concrete progress towards reaching a Final Investment Decision (“FID”) on the Saguaro Energía Facility. To date, MXP has spent over

³ Mexico Pacific Limited LLC, Application of Mexico Pacific Limited LLC for Long-Term, Multi-Contract Authorization to Export Liquefied Natural Gas to Free Trade Agreement and Non-Free Trade Agreement Nations, Docket No. 18-70-LNG (filed June 18, 2018) (“Original Application”).

⁴ *Mexico Pacific Limited LLC*, DOE/FE Order No. 4248, Docket No. 18-70-LNG (Sept. 19, 2018) (“Order No. 4248”).

⁵ *Mexico Pacific Limited LLC*, DOE/FE Order No. 4312, Docket No. 18-70-LNG (Dec. 14, 2018) (“Order No. 4312”).

⁶ *See Mexico Pacific Limited LLC*, DOE/FE Order Nos. 4248-A and 4312-A, Docket No. 18-70-LNG (June 3, 2022).

⁷ Order No. 4312 at Ordering Paragraph D.

\$300 million in developing the Facility and related infrastructure.⁸ In addition, MXP has entered into binding long-term Sale and Purchase Agreements (“SPAs”) with LNG offtake customers, including large Permian Basin natural gas producers ExxonMobil and ConocoPhillips, for over 12 mtpa of the LNG to be produced at the Saguaro Energía Facility.⁹ Despite MXP’s efforts to advance the project, however, due to circumstances and challenges outside MXP’s control, MXP will be unable to meet the current deadline of December 14, 2025 to commence export operations at the Facility.

In order to take FID, MXP’s investors and lenders will require that all Non-FTA nation export authorizations remain in full force and effect during construction of the Saguaro Energía Facility and through commencement of the Facility’s LNG export operations.¹⁰ It is therefore necessary for MXP to obtain an extension of the deadline for commencement of its LNG export operations established in Order No. 4312. For the reasons stated in this application, MXP respectfully requests an extension of the current deadline to commence its export operations to December 14, 2032.¹¹

⁸ See Declaration of José Luis Vitagliano (“Declaration”), attached hereto as Appendix C, at ¶ 10.

⁹ *Id.* at ¶ 11.

¹⁰ *Id.* at ¶ 19.

¹¹ MXP is not requesting, nor must it request, an extension of time for MXP to commence export authorizations as a condition of its authorization to export to FTA nations. In email communications between MXP and DOE/FECM dated May 18, 2023, which have been filed in Docket No. 18-70-LNG, DOE/FECM indicated that “[MXP] is not required to commence exports of natural gas to FTA nations by September 19, 2023 in order for [MXP]’s FTA authorization to remain in force, and [MXP] does not need to apply for an extension to the start date of its FTA term set forth in Order No. 4248-A (Ordering Paragraph B).”

II. BACKGROUND

A. Saguaro Energía Facility

The Saguaro Energía Facility will be located in the State of Sonora, Mexico, at a coastal site which has been permitted for LNG storage and related marine activities. The site is situated on the Gulf of California adjacent to Puerto Libertad, Mexico, approximately 160 miles south of the U.S.-Mexico border. The Facility's location is particularly well positioned to supply LNG into Asian markets, including markets in Korea, Japan, Taiwan, and Singapore each of which can be supplied by vessel from the Facility without having to transit the Panama Canal. It is also well positioned to supply markets in South America (in particular Chile, Colombia and Ecuador). When fully completed, based on current designs, the Saguaro Energía Facility will consist of three natural gas liquefaction trains having a total projected capacity of approximately 18 mtpa (912.22 Bcf/year).¹²

MXP owns approximately 1,500 acres surrounding the Facility project site. Approximately 300 acres of this total have been designated for LNG development and originally were permitted for an LNG import facility. In addition to the export authorization MXP has obtained from DOE, MXP has obtained and maintained from the appropriate Mexican authorities all permits required to authorize the construction of the Saguaro Energía Facility and exports of LNG from the Facility.¹³ These permits are held by Mexico Pacific Assets Holding S. de R.L. de C.V. through three subsidiaries, Mexico Pacific Permit Holdings S. de R.L. de C.V., Mexico Pacific Land

¹² See 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, Docket No. 22-267-LNG (Dec. 28, 2022) ("2022 Application").

¹³ Declaration at ¶ 14.

Holdings S. de R.L. de C.V. and Mexico Pacific LNG Exports S. de R.L. de C.V. MXP is providing as Exhibit A to Appendix C a list of its Mexican permits and their status.

B. Existing DOE Authorizations

In Order No. 4312, DOE/FE authorized MXP to export up to the equivalent of 621 Bcf/year of U.S.-sourced natural gas to Mexico for end use in Mexico and/or, after liquefaction in Mexico, by vessel in the form of LNG from the proposed Saguaro Energía Facility to Non-FTA nations.¹⁴ In Order No. 4312, DOE/FE concluded that MXP's exports to Non-FTA nations will not be inconsistent with the public interest.¹⁵ In granting that requested authorization, DOE/FECM relied on market studies, including its 2014 and 2015 LNG Export Studies,¹⁶ and other evidence MXP

¹⁴ *Mexico Pacific Limited LLC*, DOE/FE Order No. 4248, Docket No. 18-70-LNG (Sept. 19, 2018) ("Order No. 4248").

¹⁵ Order No. 4312 at 11.

¹⁶ *Id.* at 28 (citing U.S. Energy Info. Admin., *Effect of Increased Levels of Liquefied Natural Gas Exports on U.S. Energy Markets* (Oct. 2014) ("2014 LNG Export Study"), available at: <https://www.eia.gov/analysis/requests/fe/pdf/lng.pdf>; Center for Energy Studies at Rice University Baker Institute and Oxford Economics, *The Macroeconomic Impact of Increasing U.S. LNG Exports* (Oct. 29, 2015) ("2015 LNG Export Study"), available at: http://energy.gov/sites/prod/files/2015/12/f27/20151113_macro_impact_of_lng_exports_0.pdf).

The conclusions DOE/FE reached in its 2014 LNG Export Study and 2015 LNG Export Study remain valid. DOE/FECM recently concluded an updated LNG export study, discussed *infra*, which, like the 2014 and 2015 Export Studies, concluded that exports of LNG from the United States will not be inconsistent with the public interest. *See* Energy, Economic, and Environmental Assessment of U.S. LNG Exports: Response to Comments, U.S. Department of Energy, Office of Fossil Energy and Carbon Management (May 2025) (available at https://www.energy.gov/sites/default/files/2025-05/2024%20LNG%20Export%20Study_Response%20to%20Comments_Final_05.19.2025.pdf) at 2.

DOE has held 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 2024 LNG Export Study] are the appropriate frame of reference." *See Delfin LNG LLC*, DOE/FECM Order Nos. 3393-C and 4028-D at 23, Order Amending Authorization to Export Liquefied Natural Gas to Free Trade Agreement Countries,

submitted in Docket No. 18-70-LNG to conclude that substantial economic and public benefits are likely to flow from MXP's exports of natural gas and LNG. Specifically, DOE/FE held that:

[MXP]'s requested volume of natural gas for both export to Mexico and re-export in the form of LNG . . . will have no practical impact on the domestic supply of natural gas in the United States or on natural gas markets . . . exports of LNG will generate net economic benefits to the broader U.S. economy . . . [MXP's] proposed exports and re-exports are consistent with U.S. policy.¹⁷

On December 28, 2022, MXP filed in FECM Docket No. 22-167-LNG an application in which it requested supplemental authorization under Section 3 of the NGA (i) to export an additional volume of 425.57 Bcf/yr to FTA nations to align the export volumes granted in Order No. 4312 (621 Bcf/yr) with the increased peak liquefaction production capacity of the Saguaro Energía Facility as designed, under optimal conditions, including fuel gas requirements plus lost and unaccounted for gas, and (ii) to engage in additional long-term, multi-contract exports of U.S.-sourced natural gas by pipeline to Mexico and to re-export such natural gas as LNG in a volume equivalent to 291.22 Bcf/yr to Non-FTA nations.¹⁸ In Order No. 4995, dated April 28, 2023, DOE/FECM granted MXP authorization to export U.S.-sourced natural gas by pipeline from the United States to Mexico for end use in Mexico and/or, after liquefaction in Mexico, by vessel from the Saguaro Energía Facility to FTA nations.¹⁹ The volume authorized for export in Order No. 4995 was up to the equivalent of an incremental of 425.57 Bcf/yr, bringing the total volume approved for export to FTA nations to 1046.57 Bcf/yr.

and Granting Request to Extend Deadline to Commence Exports of Liquefied Natural Gas to Non-Free Trade Agreement Countries (issued Mar. 10, 2025) ("*Delfin LNG*") at 23.

¹⁷ Order No. 4312 at 25.

¹⁸ See 2022 Application.

¹⁹ *Mexico Pacific Limited LLC*, DOE/FECM Order No. 4995, Docket No. 22-167-LNG (Apr. 28, 2023) ("Order No. 4995").

As of the date of this Application, MXP's application for authorization to export an additional 291.22 Bcf/yr to Non-FTA nations remains pending before DOE/FECM. The export commencement deadline to be established in DOE/FECM's order on that application is not the subject of this Application.

III. REQUEST FOR EXTENSION

Good cause exists for DOE/FECM to grant MXP an extension of the deadline for commencement of exports to Non-FTA nations to December 14, 2032. MXP has experienced significant delays and challenges resulting from circumstances outside of its control. Even so, MXP has made significant progress in advancing the Saguaro Energía Facility. Given MXP's continuous expenditure of effort and of very substantial sums of money to overcome multiple challenges and to advance the project, DOE/FECM should find, consistent with its recently reaffirmed policy regarding extensions of export commencement deadlines²⁰ and its decisions in similar cases,²¹ that MXP has established the requisite good cause supporting an extension of the relevant export commencement deadline. On this basis, DOE/FECM should grant MXP an

²⁰ 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) ("Rescission of Policy") ("DOE will consider applications to extend an authorization holder's export commencement deadline and grant such extensions for good cause shown on a case-by-case basis consistent with DOE's practice prior to the issuance of the Policy Statement.").

²¹ See *Lake Charles LNG Export Company, LLC*, DOE/FE Order Nos. 3868-A and 4010-A, Order Granting Application for Extension of Commencement Deadlines (Oct. 6, 2020) (extending commencement deadline based on good cause); *Golden Pass LNG Terminal LLC*, DOE/FE Order No. 3978-C, Docket No. 12-156-LNG, Order Granting Request for Extension of Export Commencement Deadlines (Mar. 24, 2020) (extending commencement deadline based on good cause); *Cameron LNG, LLC*, DOE/FE Order No. 3846-A, Docket No. 15-90-LNG, Order Granting Application for Extension of Commencement Deadlines (Nov. 2, 2020) (extending commencement deadline based on good cause).

extension of the deadline for commencement of its exports of LNG to Non-FTA nations to December 14, 2032.

a. MXP is unable to meet the current deadline due to delays and challenges outside of its control.

MXP has made substantial efforts to advance the Saguaro Energía Facility to commercial operation. Despite these efforts, due to circumstances outside MXP's control, MXP will be unable to commence export operations by December 14, 2025.

Beginning in early 2020, the COVID-19 pandemic presented very significant challenges to the MXP project that have prevented MXP from being in a position to commence exports to Non-FTA nations by the end of this year. DOE has recognized the challenges that COVID-19 caused, and is causing, on natural gas export projects.²² In March 2020, before MXP entered into any long term contracts for the purchase and sale of LNG from the Saguaro Energía Facility, the World Health Organization declared the outbreak of COVID-19 a pandemic.²³ The negative impact upon LNG markets was immediate and prolonged. The COVID-19 pandemic and associated economic downturn adversely impacted MXP's ability to negotiate commercial and construction agreements.²⁴ From a practical perspective, governmentally-imposed measures intended to limit the spread of COVID-19 prohibited in-person meetings with potential customers, particularly those located in Asia. In addition, the market impact of COVID-19 effectively froze demand for long-term LNG contractual commitments as potential customers could not forecast

²² See *Delfin LNG* 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.”).

²³ Declaration at ¶ 6.

²⁴ *Id.*

future demand for LNG based on the unknown duration and extent of the impacts of the pandemic.²⁵

The COVID-19 pandemic also affected MXP's discussions with potential EPC contractors. In 2020, MXP was engaged in discussions with EPC contractors to solicit bids for construction of the Saguaro Energía Facility.²⁶ Persistent inflation resulting from measures intended to limit the spread of COVID-19 substantially increased the costs of the Saguaro Energía Facility from pre-pandemic estimates.²⁷ In addition, supply chain disruptions resulting from responses to COVID-19 hampered EPC contractors' ability to price and obtain critical equipment needed for the Facility.²⁸ The resulting increases in project material and labor costs, and uncertainties regarding fabrication and delivery schedules, contributed to a reluctance on the part of EPC contractors to commit to fixed price arrangements, and substantially slowed the pace of negotiations with MXP's potential EPC contractors, Bechtel and Techint.²⁹ Despite this significant pressure, MXP proceeded into detailed engineering with Bechtel and Techint in an attempt to further de-risk the project and reduce costs.

Just as it was beginning to overcome the challenges presented by the COVID-19 pandemic, in January 2024, MXP was confronted with the Biden Administration's "pause" suspending DOE's review and resolution of pending and future applications for authorization to export natural gas to Non-FTA nations. The pause created considerable uncertainty in the LNG markets generally,³⁰ and for MXP in particular. With no clear sense as to when DOE might resume its

²⁵ Declaration at ¶ 6.

²⁶ Declaration at ¶ 7.

²⁷ *Id.*

²⁸ *Id.*

²⁹ *Id.*

³⁰ Declaration at ¶ 8.

processing of natural gas export applications, MXP's contracted counterparties, prospective lenders and potential equity investors all expressed concern about the regulatory environment affecting the project.³¹ As the "pause" was announced, MXP was deep into negotiations with prospective equity investors and lenders on the financing of the Saguaro Energía Facility; the pause effectively stopped those negotiations.³²

Moreover, while MXP had received authorization to export up to 621 Bcf/year to Non-FTA nations, the pause suspended DOE/FECM processing of MXP's pending request for authorization to export an additional 291.22 Bcf/yr to such nations.³³ As a precondition to their investment in the project, prospective lenders and equity investors required MXP to have obtained authorization to export to Non-FTA nations the full capacity of the proposed three liquefaction trains, *i.e.*, 912.22 Bcf/year. The pause in DOE's processing of MXP's supplemental Non-FTA authorization request prevented MXP from obtaining this authorization, which led prospective lenders eventually to stall their negotiations with MXP over the necessary credit facility.³⁴

MXP's ability to advance the project also has been hindered by political changes that have occurred over the past eighteen months in both the U.S. and Mexico.³⁵ On October 1, 2024, Claudia Sheinbaum was sworn in as President of Mexico, succeeding President Andrés Manuel López Obrador. While both President Sheinbaum and Former President Obrador are from the same political party and support the Saguaro Energía Facility, and the Mexican federal government continues to support the project, the transition from President Obrador to President Sheinbaum

³¹ Declaration at ¶ 8.

³² *Id.*

³³ *Id.*

³⁴ *Id.*

³⁵ Declaration at ¶ 9.

involved a natural transition of staff and personnel within administrative roles. The Presidential transition in the United States in January 2025 has contributed uncertainty as to how U.S.-Mexico trade relations might evolve. All of these changes have contributed to general uncertainty in the capital markets. The result has been hesitancy on the part of sector participants to make substantial long-dated commitments of capital.

b. MXP's successful efforts to advance the Saguaro Energía Facility demonstrate its continued commitment to the project.

Despite the challenges that were outside of MXP's control, MXP has diligently and in good faith continuously made substantial efforts to advance the development of the Saguaro Energía Facility. To date MXP has incurred over \$300 million to develop the Facility and related infrastructure, including early construction works.³⁶

MXP maintains its ownership of the approximately 1500 acre site that will be the location of the Saguaro Energía Facility.³⁷ At this time, MXP has completed front-end engineering design necessary for financing and construction of the Facility. MXP has performed extensive site preparation work and continues to maintain the site, all consistent with MXP's Mexican environmental permits.³⁸ Last year MXP's contractor Techint undertook early construction works, including but not limited to site clearing and grading activities, and terrain leveling activities in an area that will support the main construction activities.³⁹ In addition, in accordance with conditions imposed by its environmental permits, MXP has moved certain flora and fauna from the project site to a purpose-built nursery and surrounding areas.⁴⁰ In 2023, as part of a robust social

³⁶ Declaration at ¶ 10.

³⁷ Declaration at ¶ 12.

³⁸ *Id.*

³⁹ *Id.*

⁴⁰ *Id.*

investment program, MXP donated land to the State of Sonora for an education complex to be built by the State and land for a clinic to be built by Mexico's Navy.⁴¹ Last February, Sonora's governor inaugurated the Puerto Libertad Educational Complex. This elementary school is the first stage of an educational facility development program, as the government will start construction of a high school during this year.⁴²

MXP has obtained from the appropriate Mexican authorities, and has maintained, all federal, state and local permits required for the start of construction of the Saguaro Energía Facility for the export of LNG from the Facility.⁴³ These include 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 Facility and associated pipelines issued by Secretaría de Energía (SENER) in November 2023, among others.⁴⁴ A list of all Mexican permits and their status is included as Exhibit A to Appendix C.

On December 14, 2023, the Secretaría de Marina (SEMAR), Mexico's Navy, and MXP signed a collaboration agreement supporting an energy infrastructure project of strategic importance to Mexico and the U.S.-Mexico bilateral relationship. Pursuant to this agreement, the parties are focused on security of the Saguaro Energía Facility, associated pipelines, and personnel, as well as rehabilitation of a government-owned airfield close to the Facility that will provide logistical benefits during the construction and operations phases of the project.

As of the date of this Application, MXP and its affiliates have entered into binding SPAs providing for the sale to third parties of over 12 mtpa of LNG produced in the Saguaro Energía

⁴¹ Declaration at ¶ 13.

⁴² *Id.*

⁴³ Declaration at ¶ 14.

⁴⁴ *Id.*

Facility for 20-year terms.⁴⁵ The counterparties to these agreements include ExxonMobil LNG Asia Pacific; Shell Eastern Trading (Pte) Ltd; ConocoPhillips Marketing & Trading Intl, LLC; Woodside Energy Trading Singapore Pte Ltd; Posco International Corporation; Zhejiang Energy International Ltd; and Guangzhou Development Gas Trading Co., Ltd.⁴⁶ These agreements evidence strong market demand, backed by creditworthy counterparties, for the LNG to be supplied by the Facility.⁴⁷ They remain valid and in full force and effect.

The market continues to support the Saguaro Energía Facility. The Facility also enjoys the support of the natural gas producer community. This is particularly true of producers operating in the Permian Basin, for which the project will provide a valuable outlet for associated gas production that currently lacks adequate access to end use and export markets.

The Mexican federal government, relevant state governments, and local governments remain supportive of the Saguaro Energía Facility.⁴⁸ These governments appreciate the value of the Facility for Mexico.⁴⁹ On November 30, 2023, and again on February 14, 2024, the Secretaría de Economía identified the Saguaro Energía Facility and related infrastructure as creating thousands of jobs.⁵⁰ Numerous Mexican officials have publicly expressed their support for the project.

Members of the U.S. Congress also support the Saguaro Energía Facility. On February 15, 2025, twenty-nine members of Congress sent a letter to President Trump, with Secretary of Energy

⁴⁵ Declaration at ¶ 11.

⁴⁶ U.S. Department of Energy, Office of Fossil Energy and Carbon Management, *Mexico Pacific Limited Facility* (June 10, 2025), available at <https://www.energy.gov/fecm/articles/mexico-pacific-limited-facility>.

⁴⁷ Declaration at ¶ 11.

⁴⁸ Declaration at ¶ 15.

⁴⁹ *Id.*

⁵⁰ *Id.*

Christopher Wright copied, requesting prompt action on MXP's pending request for supplemental authorization to export an additional 291.22 Bcf/yr to Non-FTA nations.⁵¹ A copy of this letter is attached as Exhibit B to Appendix C.

As detailed in a Change in Control filing submitted to DOE/FECM on March 5, 2025, as supplemented on March 25, 2025 and May 30, 2025,⁵² MXP has recently undergone a change in control in connection with its efforts to recapitalize and secure the additional equity and debt commitments the project will require to achieve FID. By means of a transaction that closed effective as of February 3, 2025 and a second transaction that closed effective as March 3, 2025, MXP's ownership changed, with one new member, Mexico Pacific Holdings, L.P. ("MXP Holdings"), becoming the owner of the controlling membership interest in MXP. The change in control of MXP resulting from the described transactions was designed to strengthen the Saguaro Energía Facility and enable it to secure additional investment support.⁵³

⁵¹ Declaration at ¶ 16.

⁵² MXP's Second Supplement to CIC Notice Submitted March 5, 2025, Mexico Pacific Limited LLC, Docket Nos. 18-70-LNG and 22-167-LNG (filed May 30, 2025).

⁵³ Declaration at ¶ 18.

c. MXP has established good cause for the requested extension of its original deadline for commencement of exports.

The Saguaro Energía Facility remains an active, well-supported project, and MXP continues to work actively to move the project forward. MXP has confidence in its ability to build on the success it has achieved to date in commercializing the Facility, as evidenced by the execution of binding long-term SPAs with seven creditworthy LNG offtake customers, including large US gas producers ExxonMobil and ConocoPhillips. But circumstances not under MXP's control have prevented it from progressing to the point that it can commence export activities by December of this year.

In order for MXP to take FID and to proceed with construction of the Saguaro Energía Facility, it will be necessary that both its existing and pending supplemental non-FTA export authorizations are in, and remain in, full force and effect.⁵⁴ The financing arrangements MXP has been negotiating will require an extension of time to commence LNG export operations that recognizes the amount of time MXP will require to release its EPC contractor, commence and complete construction and place the facility into service.⁵⁵ MXP anticipates that construction of all trains will take at least five years to complete after it achieves FID.⁵⁶ MXP is unlikely to be able to achieve FID before the fourth quarter of this year.⁵⁷ Therefore, MXP requires a seven-year extension of the deadline to commence export operations – to December 14, 2032. Without such an extension, the Saguaro Energía Facility will be unable to achieve FID.⁵⁸

⁵⁴ Declaration at ¶ 19.

⁵⁵ *Id.*

⁵⁶ *Id.*

⁵⁷ *Id.*

⁵⁸ *Id.*

MXP requests only a change in the deadline by which it must commence exports under the authorization granted in Docket No. 18-70-LNG. The project's location and its target markets remain unchanged. Consequently, the public interest findings underlying DOE's export orders remain valid. Granting MXP additional time to commence export operations will in no way undermine DOE's findings in the export orders that the Saguaro Energía Facility is not inconsistent with the public interest.

As MXP has shown, MXP's inability to commence export operations by December 14, 2025, has resulted from circumstances not under its control. Nevertheless, MXP has made, and continues to make, significant progress toward satisfying the conditions required to achieve FID and to commence construction of the Facility. The project is well supported in the LNG marketplace (as witnessed by its twelve binding long-term LNG SPAs signed with seven creditworthy customers) and by prospective suppliers of gas for export. MXP and its affiliates have obtained all the permits required from multiple levels of Mexican state and federal government, and the Saguaro Energía Facility enjoys broad support among Mexican public officials. MXP has commenced early construction works on the project and will be in a position to proceed once FID is achieved. MXP continues to work diligently to advance the project.

Granting MXP's application to extend its Non-FTA export commencement deadline will make it possible for MXP to complete the Saguaro Energía Facility, begin its LNG export operations and satisfy the substantial demand for LNG evidenced by its twelve long-term SPAs. This result, as DOE has previously found in this docket and has recently reaffirmed in its Response to Comments on its 2024 Export Study,⁵⁹ would not be inconsistent with the public interest.

⁵⁹ Energy, Economic, and Environmental Assessment of U.S. LNG Exports: Response to Comments, U.S. Department of Energy, Office of Fossil Energy and Carbon Management

Given all this, there is good cause for the extension of MXP's export commencement deadline from December 14, 2025 to December 14, 2032, and DOE/FECM should so find and conclude.

IV. INFORMATION REQUIRED BY 10 C.F.R. § 590.202

a. Legal Name of Applicant

The exact legal name of the applicant is Mexico Pacific Limited LLC. MXP is a limited liability company organized under the laws of Delaware with its principal place of business at 700 Louisiana Ave., Suite 2410, Houston, TX 77002. Additional information regarding MXP is available at the company's website at: <https://mexicopacific.com>.

MXP is owned by Mexico Pacific Holdings, L.P., a Delaware limited partnership.

(May 2025) (available at https://www.energy.gov/sites/default/files/2025-05/2024%20LNG%20Export%20Study_Response%20to%20Comments_Final_05.19.2025.pdf) at 2 (“[T]he the complete record from the 2024 LNG Export Study, inclusive of the Study, the comments received, and this Response to Comments, supports the proposition that exports of LNG from the United States will not be inconsistent with the public interest.”). *See also id.* at 41 (“[A]s Mexico Pacific Limited suggests, having a robust supply of natural gas and being the world leader in exports could act generally to increase U.S. influence. For these reasons, DOE considers the global energy security benefits from U.S. LNG exports to weigh favorably in public interest determinations for applications to export LNG to non-free trade agreement countries.”).

b. Communications

All correspondence and communications regarding this Application should be directed to:⁶⁰

James F. Bowe, Jr.
King & Spalding LLP
1700 Pennsylvania Avenue, NW
Suite 900
Washington, DC 20006
Tel: +1 202 626-9601
jbowe@kslaw.com

Manuela Molina
CEO
Mexico Pacific Limited LLC
700 Louisiana St, Suite 2410,
Houston, TX 77002
Tel: +1- 713 589-7493
nmolina@mexicopacific.com

Tyler R. Brown
King & Spalding LLP
1180 Peachtree Street, NE
Suite 1600
Atlanta, GA 30309
Tel: 404 572-2809
trbrown@kslaw.com

José Luis Vitagliano
SVP Asset Integration and Operational Planning
Mexico Pacific Limited LLC
Torre Omega, Campos Elíseos 345, Oficina
101, Colonia Polanco III Sección
Miguel Hidalgo Ciudad de México 11560
Tel: +52 5568287383
jvitagliano@mexicopacific.com

c. Statement of Action Requested

In relevant part, ordering paragraph (D) of Order No. 4312 requires MXP to commence commercial LNG re-export operations no later than seven years from the date of issuance of the Order (*i.e.*, December 14, 2025). MXP requests that DOE/FECM extend the deadline for commencement of commercial LNG re-export operations from the Saguaro Energía Facility under MXP's existing Non-FTA authorization issued in this docket to December 14, 2032.

d. Justification for Action Requested

As set out in detail in Section III above, MXP submits that good cause exists to grant the requested extension and that such extension is consistent with the public interest. Such an extension would be consistent with DOE's recent conclusion in its Response to Comments on its

⁶⁰ MXP respectfully requests that DOE/FECM waive its regulation limiting the number of mailing addresses for the service list to two persons, 10 C.F.R. § 590.202(a), and allow the mailing addresses of three persons to be included on the service list for this Application.

2024 Export Study that exports of LNG from the United States will not be inconsistent with the public interest.

V. APPENDICES

MXP includes the following appendices with this Application:

Appendix A Legal Opinion of Counsel

Appendix B Verification and Certified Statement of Authorized Representative

Appendix C Declaration of José Luis Vitagliano

VI. CONCLUSION

WHEREFORE, for the reasons set forth above, MXP respectfully requests that DOE/FECM issue an order amending Order Nos. 4312 and 4312-A to provide that MXP is to commence exports to Non-FTA nations by December 14, 2032. MXP respectfully requests that DOE/FECM approve this Application on or before August 1, 2025.

Respectfully submitted,

MEXICO PACIFIC LIMITED LLC

By: /s/ James F. Bowe, Jr.

James F. Bowe, Jr.

King & Spalding LLP

1700 Pennsylvania Ave., NW, Suite 900

Washington, DC 20006-4707

Counsel for Mexico Pacific Limited LLC

Dated: June 18, 2025

Appendix A

Legal Opinion of Counsel for Mexico Pacific Limited LLC

KING & SPALDING

King & Spalding LLP
1700 Pennsylvania Avenue, N.W.
Washington, D.C. 20006-4706
Tel: +1 202 737-0500
Fax: +1 202 626-3737
www.kslaw.com

James F. Bowe, Jr.
Partner
Direct Dial: +1 202 626-9601
Direct Fax: +1 202 626-3737
jbowe@kslaw.com

June 18, 2025

Ms. Amy Sweeney
Director, Office of Regulation, Analysis, and
Engagement
Office of Oil and Natural Gas
Office of Fossil Energy and Carbon Management
(FE-34)
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585

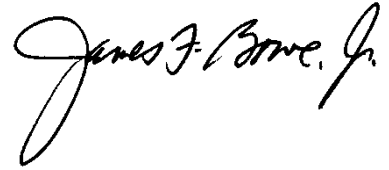
**Re: *Mexico Pacific Limited LLC*, Docket No. 18-70-LNG
APPLICATION OF MEXICO PACIFIC LIMITED LLC FOR AN
AMENDMENT TO EXTEND THE DEADLINE FOR COMMENCEMENT
OF EXPORT OPERATIONS AND REQUEST FOR EXPEDITED ACTION**

Dear Ms. Sweeney:

This opinion is provided pursuant to Section 590.202(c) of the Department of Energy Regulations, 10 C.F.R. § 590.202(c), in support of the Application of Mexico Pacific Limited LLC (“Mexico Pacific”) for an Amendment to Extend the Deadline for Commencement of Export Operations and Request for Expedited Action (the “Application”).

I am counsel to Mexico Pacific, a limited liability company organized under the laws of the State of Delaware. I have reviewed and relied upon the corporate documents of Mexico Pacific, and it is my opinion that the proposed exports described in the Application are within the limited liability company powers of Mexico Pacific.

Very truly yours,

A handwritten signature in black ink, reading "James F. Bowe, Jr." in a cursive script.

James F. Bowe, Jr.

Counsel to Mexico Pacific Limited LLC

Appendix B

Verification

VERIFICATION

I, Tyler R. Brown being first duly sworn, state that I am a duly authorized representative of Mexico Pacific Limited LLC; I have read the above Application of Mexico Pacific Limited LLC for an Amendment to Extend the Deadline for Commencement of Export Operations and Request for Expedited Action (the "Application") and I am familiar with its contents; and the matters set forth in the Application are true and correct to the best of my knowledge, information, and belief.



Tyler R. Brown

Counsel to Mexico Pacific Limited LLC

Sworn and subscribed before me this 17th day of June, 2025.



Notary Public
for Washington, DC

My Commission expires: 8-14-2027



Appendix C

Declaration of José Luis Vitagliano

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

Mexico Pacific Limited LLC

)

Docket No. 18-70-LNG

**DECLARATION OF
JOSÉ LUIS VITAGLIANO**

1. My name is José Luis Vitagliano. I currently serve as SVP Asset Integration and Operational Planning for Mexico Pacific Limited LLC (“MXP”).
2. I have worked for MXP since August 2022. My first title at MXP was Senior Managing Director, responsible for all management activities within Mexico. After 6 months, I was promoted to Vice President for Mexico Development, having as a main responsibility obtaining all Mexican permits for the company. On December 2023, I was promoted again to Senior Vice President and General Manager for all pipeline activities. On May 2024, I was asked to lead the efforts of the company to make sure all assets, contracts, and permits were consistent with customer requirements, and my title changed to Senior Vice President for Asset Integration and Operational Planning.
3. The purpose of this Declaration is to support certain factual assertions set forth in the Application of Mexico Pacific Limited LLC for an Amendment to Extend the Deadline for Commencement of Export Operations and Request for Expedited Action (“Application”) filed with the Department of Energy (“DOE”) Office of Fossil Energy and Carbon Management. Any defined terms used in this Declaration and not defined shall have the meaning as given in the Application.
4. In the Application, MXP is requesting an amendment to its DOE Order Nos. 4312 and 4312-A to extend the deadline for commencement of export operations at the Saguaro Energía Facility to December 14, 2032.
5. Except as otherwise indicated, all facts set forth in this Declaration are based upon my personal knowledge, my review of internal MXP documents, or my opinions based upon my experience and knowledge. I am authorized to submit this Declaration on behalf of MXP as part of the Application.
6. In March 2020, before MXP entered into any long-term contracts for the purchase and sale of LNG from the Saguaro Energía Facility, the World Health Organization declared the outbreak of COVID-19 a pandemic. The negative impact to LNG markets was immediate and prolonged. The COVID-19 pandemic and associated economic downturn adversely impacted MXP’s ability to negotiate commercial and construction agreements. From a practical perspective, governmentally-imposed measures intended to limit the spread of COVID-19 prohibited in-person meetings with potential customers, particularly in Asia.

In addition, the market impact of COVID-19 effectively froze demand for long-term LNG contractual commitments as potential customers could not forecast future demand for LNG based on the unknown duration and extent of the impacts of the pandemic.

7. In 2020, MXP was engaged in discussions with EPC contractors to provide EPC bids for construction of the Saguaro Energía Facility. Persistent inflation resulting from COVID-19-related disruptions substantially increased the costs of the Facility from pre-pandemic estimates. In addition, supply chain disruptions resulting from measures intended to address COVID-19 hampered EPC contractors' ability to price and obtain critical equipment needed for the Saguaro Energía Facility. The increase in project material and labor costs contributed to a reluctance on the part of EPC contractors to commit to fixed price arrangements. Despite this significant pressure, MXP proceeded into detailed engineering with Bechtel and Techint in an attempt to further derisk the project and reduce costs.
8. On January 26, 2024, the Biden Administration "paused" DOE's review of pending and future export applications to Non-FTA nations. The pause created considerable uncertainty in the LNG markets. MXP's contracted counterparties, prospective lenders and potential equity investors all expressed concern about the viability of the project in light of the pause. MXP was well into negotiations with prospective equity investors and lenders for a credit facility that would have supported project construction when the pause was issued. The pause effectively stopped all negotiations with prospective lenders. Moreover, while MXP already had received its export authorization for 621 Bcf/year to Non-FTA nations, the pause affected MXP's pending request for authorization to export an additional 291.22 Bcf/yr to such nations. As a precondition to investment in the project, prospective lenders and equity investors wanted MXP to have obtained Non-FTA nation export authorization for the full capacity of the proposed three natural gas liquefaction trains, i.e., 912.22 Bcf/year. The pause prevented MXP from obtaining the required supplemental Non-FTA authorization.
9. On October 1, 2024, Claudia Sheinbaum was sworn in as President of Mexico, succeeding President Andrés Manuel López Obrador. While both President Sheinbaum and Former President Obrador are from the same political party and support the Saguaro Energía Facility, and the Mexican federal government continues to support the project, the transition from President Obrador to President Sheinbaum involved a natural transition of staff and personnel within administrative roles. The Presidential transition in the United States in January 2025 has additional uncertainty regarding the direction of U.S.-Mexico trade relations generally. The result has been hesitancy on the part of sector participants to make substantial long-dated commitments of capital.
10. MXP has made extensive efforts and capital expenditures to continue to develop the Saguaro Energía Facility. MXP has incurred over \$300 million of costs to develop the Facility and related infrastructure, including early construction works.
11. As of the date of this Application, MXP and its affiliates have entered into binding SPAs providing for the sale of over 12 mtpa of LNG produced in the Saguaro Energía Facility to

third parties for 20-year terms. The counterparties to these agreements include ExxonMobil LNG Asia Pacific; Shell Eastern Trading (Pte) Ltd; ConocoPhillips Marketing & Trading Intl, LLC; Woodside Energy Trading Singapore Pte Ltd; Posco International Corporation; Zhejiang Energy International Ltd; and Guangzhou Development Gas Trading Co., Ltd. These agreements evidence strong market demand, backed by creditworthy counterparties, for the LNG to be supplied by the Saguaro Energía Facility.

12. MXP maintains its ownership of the approximately 1500 acres site that will be the location of the Saguaro Energía Facility. At the site and in accordance with its Mexican environmental permits, MXP has performed site preparation and other early construction works. Last year, MXP engaged contractor Techint to undertake early construction works, including, but not limited to, site clearing and grading activities, and terrain leveling activities in an area that will support the main construction activities. In addition, in accordance with conditions imposed by its environmental permits, MXP has moved certain flora and fauna from the project site to a purpose-built nursery and surrounding areas.
13. In 2023, as part of a robust social investment program, MXP donated land to the State of Sonora for an education complex to be built by the State and land for a clinic to be built by Mexico's Navy. Last February, Sonora's governor inaugurated the Puerto Libertad Educational Complex. This elementary school is the first stage of an educational facility development program, as the government will start construction of a high school during this year.
14. MXP has obtained and maintained from the appropriate Mexican authorities all federal, state and local permits required for the start of construction of a liquefaction facility and exports of LNG from the Saguaro Energía Facility, including renewed environmental impact assessments issued by the Agencia de Seguridad, Energía y Ambiente (ASEA) in October 2023 and a series of social impact assessments for the Saguaro Energía Facility and associated pipelines issued by Secretaría de Energía (SENER) in November 2023, among others. A list of all Mexican permits and their status is included as Exhibit A to this Declaration.
15. The Mexican federal government, relevant state governments, and local governments remain supportive of the Saguaro Energía Facility. These governments appreciate the value of the Facility for Mexico. On November 30, 2023, and again on February 14, 2024, the Secretaría de Economía identified the Saguaro Energía Facility and related infrastructure as creating thousands of jobs. Numerous Mexican officials have publicly expressed their support for the project. On December 14, 2023, the Secretaría de Marina (SEMAR), Mexico's Navy, and MXP signed a collaboration agreement supporting the development of the Facility as an energy infrastructure project of strategic importance to Mexico and the U.S.-Mexico bilateral relationship. Pursuant to this agreement, the parties are focused on security of the Saguaro Energía Facility, associated pipelines, and personnel, as well as rehabilitation of a government-owned airfield close to the Saguaro Energía Facility that will provide logistical benefits during the construction and operations phases of the project.

16. On February 15, 2025, twenty-nine members of Congress sent a letter to President Trump, with Secretary of Energy Christopher Wright copied, requesting prompt action on MXP's pending request for authorization to export an additional 291.22 Bcf/yr to Non-FTA nations. This letter evidences continued support for the Saguaro Energía Facility by members of US Congress. A copy of this letter is attached as Exhibit B to this Declaration.
17. In early 2025, as detailed in a change in control notice filed by MXP, MXP experienced a change in control. By means of a transaction that closed effective as of February 3, 2025 and a second transaction that closed effective as March 3, 2025, MXP's ownership changed, with one new member, Mexico Pacific Holdings, L.P. ("MXP Holdings"), becoming the owner of the controlling membership interest in MXP.
18. The change in control of MXP resulting from the described transactions was designed to strengthen the Saguaro Energía Facility and to support its recapitalization.
19. MXP is unable to meet the current December 14, 2025 deadline for commencement of export operations due to circumstances completely outside of its control. It is a precondition to FID on the project that all Non-FTA export authorizations remain in full force and effect during construction of the Saguaro Energía Facility and through commencement of the Facility's LNG export operations. Project financing arrangements require, prior to advancing to FID and starting full-scale construction, an extension that recognizes the amount of time that will be required to complete the project and place it into service. MXP anticipates that construction of all trains will take at least five years to complete after it achieves FID and is able to release its contractors to commence construction. MXP is unlikely to be able to achieve FID before the fourth quarter of this year. Therefore, it is necessary to have an extension of the deadline for commencement of export operations until December 14, 2032, to ensure that the project is in-service before the expiration of the deadline in the DOE export orders. That is, MXP needs an extension of time of seven years in order to proceed to FID and release the EPC contractor. Without such an extension, the Saguaro Energía Facility is unlikely to achieve FID.
20. MXP has confidence in its ability to complete the commercialization of the Saguaro Energía Facility and the public interest findings underlying DOE's export orders remain valid.
21. This concludes my Declaration.

Exhibit A

Permit	Agency	Summary / Purpose	Approved Date
Permiso de Exportación	Secretaría de Energía (SENER)	Approval to export LNG from Mexico to global markets, 20-year term for full Phase I (3-train) volumes	July 13, 2023
Manifestación de Impacto Ambiental (MIA)	Agencia de Seguridad, Energía y Ambiente (ASEA)	Environmental Impact Assessment and Risk Study	August 10, 2018 and September 14, 2023
Modificación del MIA	Agencia de Seguridad, Energía y Ambiente (ASEA)	Environmental Impact Assessment and Risk Study, modification extends term of permit, 5 years for construction, 30 years for operation	October 24, 2023
Autorización Arqueológica	Instituto Nacional de Antropología e Historia (INAH)	Approval of work in areas of archaeological monuments	November 10, 2023
Constancia de Registro de la Conformación del Sistema de Administración de Seguridad Industrial, Seguridad Operativa, y Protección al Medio Ambiente (SASISOPA)	Agencia de Seguridad, Energía y Ambiente (ASEA)	Environmental Safety Management System Registration	August 11, 2022
Estudio Técnico Justificativo (ETJ)	Agencia de Seguridad, Energía y Ambiente (ASEA)	Change in land use and zoning	October 30, 2023
Permiso de Licuefacción	Comisión Reguladora de Energía (CRE)	Permit for the liquefaction of natural gas in Puerto Libertad, Sonora	June 27, 2019
Modificación del Permiso de Licuefacción	Comisión Reguladora de Energía (CRE)	Modification of the previously issued liquefaction permit, including change in development calendar and optimization of equipment selection, design, and engineering	November 7, 2023
Permiso Generación Eléctrica Aislada	Comisión Reguladora de Energía (CRE)	Power generation and use within the LNG facility and at each compressor station location for the Sierra Madre Pipeline	October 30, 2023
Renovación de los Derechos de Concesión 289.08, Direccion General De Zona Federal Maritimo Terrestre y Ambientes Costeros (ZOFEMAT)	Secretaría de Medio Ambiente y Recursos Naturales (SEMARNAT)	Concession for the construction and operation of a jetty	July 12, 2023
Renovación de los Derechos de Concesión 028.05, Direccion General De Zona Federal Maritimo Terrestre y Ambientes Costeros (ZOFEMAT)	Secretaría de Medio Ambiente y Recursos Naturales (SEMARNAT)	Concession for the construction and operation of marine facilities	July 17, 2023
Permiso Transporte	Comisión Reguladora de Energía (CRE)	Permit to transport natural gas by pipeline	September 28, 2023
Tabuladores de Instituto de Administración y Avalúos de Bienes Nacionales (Indaabin)	Secretaría de Energía (SENER)	Appraisal tables to acquire pipeline Right-of-Way and land plots	January 8, 2024 (SON) January 8, 2024 (CHI)
Evaluación de Impacto Social y Ambiental (Evis)	Secretaría de Energía (SENER)	Social Impact Assessment for LNG terminal and Sierra Madre Pipeline	November 24, 2023
Concesión Portuaria	Secretaría de Marina (SEMAR), Armada de México	Concession for the construction and operation of an exclusive port	September 27, 2024

Exhibit B

Congress of the United States

Washington, DC 20515

February 11, 2025

The Honorable Donald J. Trump
President
The White House
1600 Pennsylvania Avenue, NW
Washington, D.C. 20500

President Trump:

We request your prompt action on a long-pending liquefied natural gas (LNG) export authorization at the U.S. Department of Energy (DOE). LNG exports create hundreds of thousands of jobs in America and leverage our abundant natural gas resources to counter trade imbalances worldwide. We applaud your early action in reversing this Biden Administration policy and unleashing American energy dominance.

Mexico Pacific, a U.S. LNG company, is developing the \$15 billion Saguaro Energía LNG facility in Sonora, Mexico. This facility will facilitate a critical evacuation and supply corridor for U.S. Permian Basin producers to reach global LNG markets. All of the natural gas supplying the LNG facility will be sourced from the United States and transported by pipelines to the LNG facility on the west coast of Mexico, enabling U.S. producers to access customers worldwide.

The Mexico Pacific project represents a vital solution for Permian Basin producers—including project partners ExxonMobil and ConocoPhillips—to evacuate over 1,000 Bcf/yr (nearly 3 Bcf/d) of associated natural gas to markets in Asia. Many of our Asian allies are seeking to strengthen their dependence on American energy as they reduce their reliance on coal for power generation.

Fortunately, the Federal Energy Regulatory Commission (FERC) approved the 157-mile Saguaro Connector Pipeline in February 2024, which will transport 100% Permian Basin natural gas from Pecos, Texas, to Mexico Pacific's LNG export facility in western Mexico. The U.S. segment of the project alone is a multi-billion-dollar investment that will stimulate regional U.S. and national economic growth and create approximately 1,500 construction jobs in Texas.

Mexico Pacific LNG has been delayed since January 2024 after President Biden issued an executive order pausing all LNG export permits. Despite Mexico Pacific's hardship, this project is otherwise shovel-ready and can begin construction immediately with your intervention.

Given that Mexico Pacific LNG has already received FERC approval, we respectfully ask you to issue their non-FTA LNG export permit. This will create thousands of jobs and solidify America's position as a dominant player in the global energy market.

We greatly appreciate your attention to this critical matter and your efforts to Make America Great Again!

Sincerely,



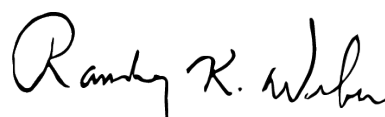
Wesley P. Hunt
Member of Congress



Troy Nehls
Member of Congress



Gus M. Bilirakis
Member of Congress



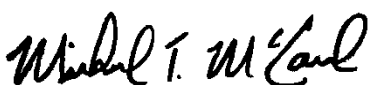
Randy Weber
Member of Congress



Jodey C. Arrington
Member of Congress



Monica De La Cruz
Member of Congress



Michael T. McCaul
Member of Congress



Harriet Hageman
Member of Congress



August Pfluger
Member of Congress



Roger Williams
Member of Congress



Dan Crenshaw
Member of Congress



Pete Stauber
Member of Congress



John R. Carter
Member of Congress



Tony Gonzales
Member of Congress



Brian Babin, D.D.S.
Member of Congress



Julie Fedorchak
Member of Congress



Morgan Luttrell
Member of Congress



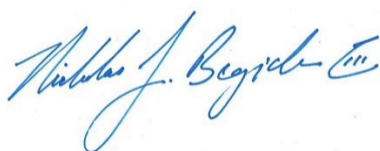
Brandon Gill
Member of Congress



Keith Self
Member of Congress



Jake Ellzey
Member of Congress



Nick Begich
Congressman for All Alaska



Nathaniel Moran
Member of Congress



Tom McClintock
Member of Congress



Mike Collins
Member of Congress



Daniel Webster
Member of Congress



Mike Ezell
Member of Congress



Jeff Hurd
Member of Congress



Amata Radewagen
Member of Congress



Addison McDowell
Member of Congress

CC: Susie Wiles, White House Chief of Staff
Chris Wright, U.S. Secretary of Energy

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

Mexico Pacific Limited LLC

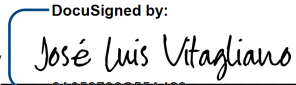
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Docket Nos. 18-70-LNG

VERIFICATION

Pursuant to 10 C.F.R. § 590.103(b), I, José Luis Vitagliano, hereby verify under penalty of perjury that I am authorized to execute this verification, that I have read the Declaration of José Luis Vitagliano, and that the facts stated therein are true and correct to the best of my knowledge.

Electronically signed on June 17, 2025.

/s/  6A053796C55A429...

José Luis Vitagliano
SVP Asset Integration and Operational
Planning
Mexico Pacific Limited LLC
Torre Omega, Campos Elíseos 345,
Oficina 101, Colonia Polanco III Sección
Miguel Hidalgo Ciudad de México 11560