

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

In The Matter Of:)	
)	
)	
NFE Altamira FLNG, S. de R.L. de C.V.)	Docket No. 22-110-LNG
)	

**ANSWER OF NFE ALTAMIRA FLNG, S. DE R.L. DE C.V.
IN OPPOSITION TO MOTION TO INTERVENE OF PUBLIC CITIZEN, INC.**

Pursuant to Section 590.303(e) of the regulations of the United States Department of Energy (“DOE”),¹ NFE Altamira FLNG, S. de R.L. de C.V. (“NFE Altamira”) hereby submits this answer in opposition (“Answer”) to Public Citizen, Inc.’s (“Public Citizen”) Motion to Intervene (“Motion”) filed in the above-captioned proceeding on June 9, 2025.² In support of the instant Answer, NFE Altamira provides as follows:

**I.
BACKGROUND**

On August 31, 2024, DOE’s Office of Fossil Energy and Carbon Management (“DOE/FECM”) issued an order authorizing exports from NFE Altamira’s floating liquefaction and export terminal project located off the coast of Altamira Tamaulipas, Mexico, to Non-Free Trade Agreement Nations for a term of five years, commencing on the date of the order (“Non-FTA Order”).³ On April 1, 2025, NFE Altamira filed a request with DOE/FECM seeking an

¹ 10 C.F.R. § 590.303(e) (2024).

² *NFE Altamira FLNG, S. de R.L. de C.V.*, Motion to Intervene of Public Citizen, Inc., Docket No. 22-110-LNG (June 9, 2025).

³ *NFE Altamira FLNG, S. de R.L. de C.V.*, Order Granting Long-Term Authorization to Re-Export U.S.-Sourced Natural Gas in the Form of Liquefied Natural Gas from Mexico to Non-Free Trade Agreement Nations, DOE/FECM Order No. 5156, Docket No. 22-110-LNG (Aug. 31, 2024).

extension of the term of the Non-FTA Order through December 31, 2050 (“Extension Request”).⁴ On May 23, 2025, DOE/FECM published a notice of NFE Altamira’s Extension Request in the Federal Register, and set a deadline of June 9, 2025 to file “[p]rotests, motions to intervene, or notices of intervention, as applicable, requests for additional procedures, and written comments.”⁵ On June 9, 2025, Public Citizen filed its Motion. As further explained in this Answer, Public Citizen’s Motion fails to specify any particularized interest in the Extension Request, claiming that its interest is unique but failing to provide any support for such assertion. Further, the Motion fails to provide any factual or legal support for its claims, despite DOE/FECM’s regulations requiring such information. In this regard, DOE/FECM should reject Public Citizen’s Motion as legally deficient.

II. ANSWER

Pursuant to DOE’s regulations, a person who seeks to become a party to a proceeding must “set[] out clearly and concisely the facts upon which the petitioner’s claim of interest is based”⁶ in its motion to intervene and “state, to the extent known, the position taken by the movant and the factual and legal basis for such positions in order to advise the parties and [DOE] as to the specific issues of policy, fact, or law to be raised or controverted.”⁷ Public Citizen’s Motion fails to provide this required information.

The Motion only provides the vaguest attempt at asserting the organization’s general interest in any gas proceeding, paraphrasing the standard for any application to DOE/FECM under

⁴ *NFE Altamira FLNG, S. de R.L. de C.V.*, Request for Extension of Term, Docket No. 22-110-LNG (April 1, 2025).

⁵ U.S. Dep’t of Energy, Office of Fossil Energy and Carbon Mgmt., *NFE Altamira FLNG, S. de R.L. de C.V.; Application to Amend Export Term Through December 31, 2050, for Existing Non-Free Trade Agreement Authorization*, 90 Fed. Reg. 22,080 (May 23, 2025).

⁶ 10 C.F.R. § 590.303(b).

⁷ *Id.* § 590.303(c).

Section 3 of the Natural Gas Act (“to ensure that applications to export U.S. natural gas are consistent with the public interest”).⁸ Although Public Citizen claims that the Extension Request “*may* come at the expense of higher domestic energy prices for Americans and decrease sufficient availability of domestic gas supply,”⁹ it entirely fails to provide the required “factual and legal basis for such positions”; “the facts upon which the petitioner’s claim of interest is based”; and “the specific issues of policy, fact, or law to be raised or controverted.”¹⁰

DOE/FECM should not permit Public Citizen to intervene in this proceeding based on the sparse contents of the Motion. As DOE has previously noted in denying other motions to intervene filed by Public Citizen, “DOE stated in the [Federal Register notice] that all protests, comments, motions to intervene, or notices of intervention *must meet the requirements* specified by the regulations in 10 CFR part 590, and thus Public Citizen was on notice of these compliance requirements.”¹¹ The Federal Register notice for NFE Altamira’s Extension Request made this same express stipulation,¹² and Public Citizen was well aware of such requirements, especially given that DOE/FECM has denied Public Citizen’s interventions resulting from such deficiencies in the past.¹³ Having once again failed to comply with the DOE standard for interventions, Public Citizen’s Motion should be rejected.

⁸ *Motion* at 1.

⁹ *Id.* (emphasis added).

¹⁰ *See supra* nn.6-7.

¹¹ *Port Arthur LNG, LLC*, Order Granting Application to Extend Term to Begin Exports of Liquefied Natural Gas to Free Trade Agreement Countries and to Extend Deadline to Commence Exports of Liquefied Natural Gas to Non-Free Trade Agreement Countries, at 11, DOE/FECM Order Nos. 3698-C & 4372-B, Docket Nos. 15-53-LNG, 15-96-LNG, 18-162-LNG (Apr. 21, 2023) (emphasis added) (cleaned up).

¹² *See supra* n.5.

¹³ *See supra* n.11; *see also Sabine Pass Liquefaction, LLC*, Order Granting Blanket Authorization to Export Previously Imported Liquefied Natural Gas by Vessel to Free Trade Agreement and Non-Free Trade Agreement Nations, DOE/FECM Order No. 5125, Docket No. 24-28-LNG (June 6, 2024) (“We find that DOE’s regulation governing intervention, 10 C.F.R. § 590.303, sets forth a particularized standard for intervention Public Citizen falls short of this regulatory requirement here, and therefore we deny the Motion to Intervene.”).

III. CONCLUSION

For the reasons detailed in the instant Answer, NFE Altamira respectfully requests that DOE/FECM reject Public Citizen's Motion.

Respectfully submitted,

/s/ Lisa M. Tonery

Lisa M. Tonery

Mariah T. Johnston

Jacob I. Cunningham

Attorneys for

NFE Altamira FLNG, S. de R.L. de C.V.

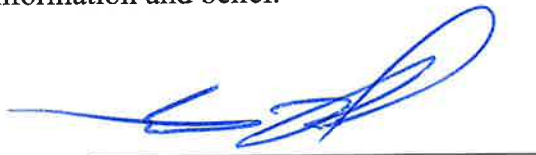
Dated: June 23, 2025

VERIFICATION

State of New York)

County of New York)

BEFORE ME, the undersigned authority, on this day personally appeared Matthew Reinhard, who, having been by me first duly sworn, on oath says that he is the Authorized Signatory, for NFE Altamira FLNG, S. de R.L. de C.V. and is duly authorized to make this Verification; that he has read the foregoing instrument and that the facts therein stated are true and correct to the best of his knowledge, information and belief.



Matthew Reinhard
Authorized Signatory

SWORN TO AND SUBSCRIBED before me on the 23rd day of June, 2025.



Name: Christina Robins

Title: Notary Public

My Commission expires:

CHRISTINA ROBINS
NOTARY PUBLIC-STATE OF NEW YORK
No. 01RO6322706
Qualified in New York County
My Commission Expires 05-04-2027

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at New York, N.Y., this 23rd day of June, 2025.

/s/ Dionne McCallum-George
Dionne McCallum-George
Executive Assistant on behalf of
NFE Altamira FLNG, S. de R.L. de C.V.