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By Docket Room at 4:05 pm, Jun 26, 2025

June 26, 2025

Ms. Amy Sweeney, Director
Office of Regulation and International Engagement
Office of Fossil Energy
Forrestal Building FE-34, Room 3E-052
1000 Independence Avenue, S.W.
Washington, D.C. 20585

Re: In the Matter of Application of Golden Pass LNG Terminal LLC for Blanket
Authorization to Export Previously Imported LNG
FE Docket: No. 25-__-LNG

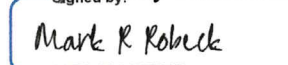
Dear Ms. Sweeney,

Please find attached Golden Pass LNG Terminal LLC's ("GPLNG") application requesting a blanket authorization from the U.S. Department of Energy's Office of Fossil Energy and Carbon Management ("DOE/FECM") to export liquefied natural gas ("LNG") previously imported into the United States for a two-year term commencing on October 1, 2025. The following documents are included in support of the application:

Appendix A – Verification
Appendix B – Opinion of Counsel
Appendix C – Certified Statements of Authority

If you have any questions, please contact me at Mark.Robeck@goldenpasslng.com or 713-324-6765.

Respectfully submitted,

Signed by:

01EF2CB6470F48F...
Mark R. Robeck
Assistant General Counsel

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

Golden Pass LNG Terminal LLC

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Docket No. 25-__-LNG

**APPLICATION OF GOLDEN PASS LNG TERMINAL LLC
FOR BLANKET AUTHORIZATION TO EXPORT PREVIOUSLY IMPORTED
LIQUEFIED NATURAL GAS**

Communications with respect to this
Application should be addressed to:

Jeff Hammad
Chief Commercial Officer
Golden Pass LNG Terminal LLC
811 Louisiana Street, Suite 1500
Houston, TX 77002
713.324.6926
Email: jeff.hammad@goldenpasslng.com

Mark R. Robeck
Assistant General Counsel
Golden Pass LNG Terminal LLC
811 Louisiana Street, Suite 1500
Houston, TX 77002
713.324.6765
Email: mark.robeck@goldenpasslng.com

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

In The Matter Of:)	
)	
Golden Pass LNG Terminal LLC)	Docket No. 25-__-LNG
)	

**APPLICATION OF GOLDEN PASS LNG TERMINAL LLC
FOR BLANKET AUTHORIZATION TO EXPORT PREVIOUSLY IMPORTED
LIQUEFIED NATURAL GAS**

Pursuant to Section 3 of the Natural Gas Act (“NGA”)¹ and Part 590 of the Department of Energy’s (“DOE”) regulations², Golden Pass LNG Terminal LLC (“GPLNG”) requests that DOE’s Office of Fossil Energy and Carbon Management (“DOE/FECM”) issue an order granting blanket authorization for GPLNG to engage in short-term exports of up to 50 billion cubic feet (“Bcf”)³ of liquefied natural gas (“LNG”), on a cumulative basis, that will have been previously imported into the U.S. from foreign sources, for a two-year period commencing on October 1, 2025.⁴ GPLNG is seeking such authorization to export previously imported LNG from the GPLNG terminal, in Sabine Pass, Texas, to any country with the capacity to import LNG via ocean-going carrier and with which trade is not prohibited by U.S. law or policy.

In support of its application, GPLNG states as follows:

¹ 15 U.S.C. § 717b (2018).

² 10 C.F.R. Part 590 (2023).

³ The equivalent of up to approximately 51 to 53 Trillion British Thermal units (“TBtus”).

⁴ October 1, 2025, is the first day of the month that GPLNG anticipates Train 1 of the export facility being ready to commence start-up activities.

I.
DESCRIPTION OF THE APPLICANT

The exact name of the applicant is Golden Pass LNG Terminal LLC, which is a Delaware limited liability corporation authorized to do business in the states of Texas and Delaware and has its principal place of business at 811 Louisiana Street, Suite 1500, Houston, Texas 77002. GPLNG is owned by QatarEnergy U.S. Investments (1) LLC, a Delaware limited liability company (an indirect subsidiary of QatarEnergy) and Golden Pass LNG Terminal Investments LLC, a Delaware limited liability Company (an indirect subsidiary of ExxonMobil Corporation).

II.
COMMUNICATIONS AND CORRESPONDENCE

All correspondence and communications concerning this application, including all service of pleadings and notices, should be directed to the following persons:

Jeff Hammad
Chief Commercial Officer
Golden Pass LNG Terminal LLC
811 Louisiana Street, Suite 1500
Houston, TX 77002
713.324.6926
Email: jeff.hammad@goldenpasslng.com

Mark R. Robeck
Assistant General Counsel
Golden Pass LNG Terminal LLC
811 Louisiana Street, Suite 1500
Houston, TX 77002
713.324.6765
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Pursuant to Section 590.103(b) of DOE's regulations,⁵ GPLNG hereby certifies that the above listed persons and the undersigned are the duly authorized representatives of GPLNG.

⁵ *Id.* § 590.103(b).

III.

Description of Proposal

GPLNG requests blanket authorization to export previously imported LNG on a short-term or spot market basis up to 50 Bcf (the equivalent of approximately 51 to 53 TBtus) cumulatively over a two-year period commencing on October 1, 2025. GPLNG is requesting such authorization to export LNG for itself and as agent for third parties who may hold title to the LNG at the time of export. GPLNG anticipates exporting previously imported LNG to any country with the capacity to import LNG via ocean-going carrier and with which trade is not prohibited by U.S. law or policy. GPLNG is not herein seeking authorization to export domestically-produced natural gas or LNG.⁶ The LNG that is proposed to be exported would be derived from GPLNG's LNG importing activities and will be residing in LNG storage tanks at the GPLNG terminal. The LNG will either be re-exported or regasified to be used as fuel gas at the facility. GPLNG further plans to use the imported LNG as part of the start-up of its export facility.⁷ And, contingent on U.S. and global market price signals, the LNG could be regasified to be consumed in the domestic natural gas market.

⁶ GPLNG is currently authorized by the DOE/FECM to export domestically produced liquefied natural gas ("LNG") by vessel from the GPLNG Export Terminal in Sabine Pass, Texas, in a volume equivalent to 937 Billion cubic feet per year ("Bcf/yr") to non-Free Trade Agreement countries ("non-FTAs") and Free Trade Agreement countries ("FTAs"). See, *Golden Pass Products LLC*, FE Docket No. 12-156-LNG, DOE/FE Order No. 3978 (April 25, 2017); amended DOE/FE Order No. 3978-B (March 4, 2020), DOE/FE Order No. 3978-C (March 24, 2020), DOE/FECM Order No. 3978-E (April 27, 2022). GPLNG is also currently authorized to import natural gas. See, *Golden Pass LNG Terminal LLC*, DOE/FECM Docket No. 24-1-LNG, DOE/FECM Order No. 5095 (Feb. 12, 2024). Following the issuance of Order No. 3978, GPLNG filed with the DOE/FE a notification that Golden Pass Products, LLC ("GPP"), the prior authorization holder, had merged with and into GPLNG effective June 18, 2019. For ease of reference, this Request will refer to both GPP and GPLNG as "GPLNG." See *Golden Pass Products LLC*, FE Docket No. 12- 156-LNG, DOE/FE Order No. 3978-B (March 4, 2020).

⁷ It is common to import LNG for the start up of new export facilities to more efficiently cool down the liquefaction equipment. Such cargoes are often referred to as "cool down" cargoes.

No physical modifications to the GPLNG terminal are required to accommodate the export authorization requested herein. There are no other proceedings related to this application currently pending before DOE or any other federal agency.

IV. PUBLIC INTEREST

Pursuant to Section 3 of the NGA, applications to export natural gas to nations with which there is in effect a free trade agreement (“FTA”) requiring national treatment for trade in natural gas “shall be deemed to be consistent with the public interest” and, therefore, the FTA portion of the instant application should be “granted without modification or delay.”⁸ With respect to the Non-FTA portion of this application, DOE/FECM is required to authorize exports of natural gas to Non-FTA nations unless there is a finding that such exports “will not be consistent with the public interest.”⁹ Section 3 thus creates a statutory presumption in favor of approval of this application which opponents bear the burden of overcoming.¹⁰ Further, in evaluating an export application, DOE/FECM applies the principles described in DOE Delegation Order No. 0204-111, which focuses primarily on domestic need for the gas to be exported, and DOE’s 1984 Policy Guidelines.¹¹ Further, Executive Order 14154,

⁸ 15 U.S.C. § 717b(c).

⁹ 15 U.S.C. § 717b(a).

¹⁰ See *Sierra Club v. DOE*, 867 F.3d 189, 203 (D.C. Cir. 2017); see also *Panhandle Producers and Royalty Owners Ass’n v. ERA*, 822 F.2d 1105, 1111 (D.C. Cir. 1987) (finding that Section 3 of the NGA “requires an affirmative showing of inconsistency with the public interest to deny an application” and that a “presumption favoring ... authorization ... is completely consistent with, if not mandated by, the statutory directive.”) (emphasis in original).

¹¹ See U.S. Dep’t of Energy, New Policy Guidelines and Delegation Orders from Secretary of Energy to Economic Regulatory Administration and Federal Energy Regulatory Commission Related to Regulation of Imported Natural Gas, 49 Fed. Reg. 6684 (Feb. 22, 1984) (hereinafter “1984 Policy Guidelines”) (incorporating DOE Delegation Order No. 0204-111).

Unleashing American Energy (Jan. 20, 2025), noted that the energy policies of the United States include: “protect[ing] the United States’s economic and national security and military preparedness by ensuring that an abundant supply of reliable energy is readily accessible in every state and territory of the Nation.”¹²

In addition, on May 19, 2025, DOE published its Response to Comments for the 2024 LNG Export Study: Energy, Economic, and Environmental Assessment of U.S. LNG Exports (“Response to Comments”).¹³ In the Response to Comments, DOE noted in its Conclusions that it “continues to endorse the principle set forth in its 1984 Policy Guidelines” and that “the record evidence from [the] 2024 LNG Export Study and the public comments received support the proposition that exports of LNG from the United States will not inconsistent with the public interest.”¹⁴ DOE further found that “U.S. domestic natural gas supply is sufficient to meet domestic and market-based global demand for U.S. natural gas (including LNG).”¹⁵ As the natural gas that that this application seeks to export will be first imported, it will not have an adverse impact on the domestic supplies or prices. Nor is foreign sourced natural gas needed to meet domestic demands.

¹² 90 FR 8353 (Jan. 29, 2025) (revoking, among others, Executive Order 13990, *Protective Public Health and the Environment and Restoring Science to Tackle the Climate Crisis* (Jan. 20, 2021), Executive Order 14008, *Tackling the Climate Crisis at Home and Abroad* (Jan. 27, 2021), and Executive Order 14096, *Revitalizing Our Nation’s Commitment to Environmental Justice for All* (April 21, 2023)).

¹³ See 90 Fed. Reg. 21912 (May 22, 2025).

¹⁴ 2024 LNG Export Study Response to Comments Final 05.19.2025.pdf, at p. 50.

¹⁵ *Id.* at p. 47.

As detailed below, GPLNG's proposal to export LNG to those countries with the capacity to import LNG via ocean-going carrier and with which trade is not prohibited by U.S. law or policy, is consistent with Section 3 of the NGA and DOE policy.

GPLNG is requesting authorization to export LNG for itself and as agent for third parties who themselves hold title to the LNG at the time of export. GPLNG will comply with all DOE/FECM requirements for exporters and agents, including the registration requirements as first established in *Freeport LNG Expansion, L.P., et al.*, DOE/FE Order No. 2913, and confirmed in *Gulf Coast LNG Export, LLC*, DOE/FE Order No. 3163.¹⁶ In this regard, GPLNG, when acting as agent, will register with DOE/FECM each LNG title holder for whom it seeks to export as agent, and will provide DOE/FECM with a written statement by the title holder acknowledging and agreeing to (i) comply with all requirements in GPLNG's export authorization; and (ii) include those requirements in any subsequent purchase or sale agreement entered into by the title holder.

Granting GPLNG's short-term blanket authorization as requested herein would facilitate GPLNG's start up of its export terminal and avail itself of spot-market LNG import cargoes. Also, depending on domestic and global market price signals, the LNG could be regasified to be consumed in the domestic natural gas market, which in turn would help to further promote the liquidity of supply available to the U.S. market and would thereby serve

¹⁶ See *Freeport LNG Expansion, L.P. & FLNG Liquefaction, LLC*, Order Granting Long-Term Authorization to Export Liquefied Natural Gas From Freeport LNG Terminal to Free Trade Nations, DOE/FE Order No. 2913, FE Docket No. 10-160-LNG (Feb. 10, 2011), *Errata* (Feb. 17, 2011); *Gulf Coast LNG Export, LLC*, Order Granting Long-Term Multi-Contract Authorization to Export Liquefied Natural Gas By Vessel From the Proposed Brownsville Terminal to Free Trade Agreement Nations, DOE/FE Order No. 3163, FE Docket No. 12-05-LNG (Oct. 16, 2012).

to moderate U.S. gas price volatility. As such, the requested export authorization is consistent with the public interest.

V. **ENVIRONMENTAL IMPACT**

GPLNG is currently authorized by DOE/FECM to import LNG from various international sources by vessel, up to a total volume equivalent to 50 Bcf of natural gas, at any LNG import terminal in the United States and its territories.¹⁷ GPLNG is also currently authorized by DOE/FECM to export domestically produced LNG by vessel from the GPLNG Export Terminal in Sabine Pass, Texas, on its own behalf and as agent for other entities that hold title to the natural gas, pursuant to one or more long-term contracts, in a volume equivalent to 937 Billion cubic feet per year (“Bcf/yr”) to non-Free Trade Agreement countries (“non-FTAs”)¹⁸ and Free Trade Agreement countries (“FTAs”)¹⁹ from LNG Export Terminal facilities approved by the Federal Energy Regulatory Commission (“FERC”) and currently under construction near Sabine Pass, Texas.²⁰

¹⁷ *Golden Pass LNG Terminal LLC*, DOE/FECM Docket No. 24-1-LNG, DOE/FECM Order No. 5095 (Feb. 12, 2024).

¹⁸ *Golden Pass Products LLC*, FE Docket No. 12-156-LNG, DOE/FE Order No. 3978 (April 25, 2017); *amended* DOE/FE Order No. 3978-B (March 4, 2020), DOE/FE Order No. 3978-C (March 24, 2020) DOE/FECM Order No. 3978-E (April 27, 2022), *reh’g denied*, Order No. 3978-F (June 24, 2022), *petition for review dismissed*, *Sierra Club v. Department of Energy*, No. 22-1218 (D.C.Cir. July 16, 2024). Following the issuance of Order No. 3978, GPLNG filed with the DOE/FE a notification that Golden Pass Products, LLC (“GPP”), the prior authorization holder, had merged with and into GPLNG effective June 18, 2019. For ease of reference, this Request will refer to both GPP and GPLNG as “GPLNG.” See *Golden Pass Products LLC*, FE Docket No. 12-156-LNG, DOE/FE Order No. 3978-B (March 4, 2020).

¹⁹ *Golden Pass Products LLC*, FE Docket No. 12-88-LNG, Order No. 3147 (September 27, 2012); *amended* DOE/FE Order No 3147-A (March 4, 2020), DOE/FE Order No 3147-B (March 24, 2020), and DOE/FE Order No. 3147-C (May 22, 2020).

²⁰ *Golden Pass Products LLC and Golden Pass Pipeline LLC*, 157 FERC ¶ 61,222 (2016). The FERC order also granted the application of Golden Pass Pipeline LLC (“GPPL”) under Section 7 of the Natural Gas Act and Part 157 of the FERC’s regulations for a certificate of public convenience and necessity to construct and operate compression and looping facilities in Texas and Louisiana to make GPPL’s existing pipeline facilities bi-directional and enable it to transport up to 2.5 billion cubic feet per day (“Bcf/d”) of natural gas to the proposed

No changes to the GPLNG terminal facilities would be required for GPLNG's proposed exportation of foreign-sourced LNG. Consequently, granting this application will not be a federal action significantly affecting the human environment within the meaning of the National Environmental Policy Act ("NEPA").²¹ Therefore, an environmental impact statement or environmental assessment is not required.²²

VI.

APPENDICES

The following appendices are attached hereto and incorporated by reference herein:

Appendix A: Verification
Appendix B: Opinion of Counsel
Appendix C: Certified Statements of Authority

VII.

CONCLUSION

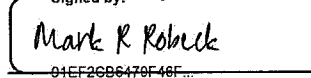
For the foregoing reasons, GPLNG respectfully requests that DOE/FECM determine that GPLNG's request for blanket authorization as discussed herein, is not inconsistent with the public interest, and grant such authorization as expeditiously as possible but no later than October 1, 2025.

GPLNG export facilities. The construction activities and facilities are sometimes referenced herein as the "Project."

²¹ 42 U.S.C. §§ 4321, *et seq.*

²² Even if a NEPA analysis were required, DOE has already determined that, absent extraordinary circumstances (and there is none here), the export of LNG does not have a significant affect on the human environment within the meaning of NEPA and thus promulgated a categorical exclusion for LNG exports. 10 CFR Pt. 1021, Subpt. D, App. B, § B5.7.

Respectfully submitted,

A handwritten signature in black ink, reading "Mark R. Robeck", is enclosed within a rectangular box. Below the signature, the text "04EF2CDB479F46F..." is visible.

Mark R. Robeck
Assistant General Counsel
Golden Pass LNG Terminal LLC
811 Louisiana Street, Suite 1500
Houston, TX 77002
713.324.6765
Email: mark.robeck@goldenpasslng.com
Attorney for Golden Pass LNG Terminal LLC

Dated: June 26, 2025

Appendix A: Verification

VERIFICATION

THE STATE OF TEXAS

§

§

COUNTY OF HARRIS

§

BEFORE ME, the undersigned authority, on this 26th day of June, 2025, personally appeared, electronically, Mark R. Robeck, having been by me first duly sworn, on oath says that he an Associate General Counsel for Golden Pass LNG Terminal LLC and is duly authorized to make this Verification; that he has read the foregoing Application of Golden Pass LNG Terminal LLC for Blanket Authorization to Export Previously Imported Liquefied Natural Gas and that the facts therein stated are true and correct to the best of his knowledge, information and belief.

Signed by:

Mark R. Robeck

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Mark R. Robeck

SUBSCRIBED AND SWORN TO BEFORE ME, the undersigned notary public, on the 26th day of June 2025, to certify which witness my hand seal of office.

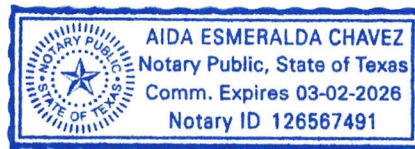
Aida E. Chavez

Name: Aida Chavez

Title: Notary Public

My Commission Expires:

03-02-2026



Appendix B: Opinion of Counsel



June 26, 2025

U.S. Department of Energy
Office of Fossil Energy and Carbon Management, FE-34
1000 Independence Avenue, SW
Washington, D.C. 20585

Re: Docket No. 25-__-LNG
Application of Golden Pass LNG Terminal LLC for Blanket Authorization to Export
Previously Imported Liquefied Natural Gas

Dear Sir or Madam:

This opinion of counsel is provided in accordance with the requirements of section 590.202(c) of the U.S. Department of Energy's regulations, 10 C.F.R. § 590.202 (c) (2023). I have examined the Limited Liability Company Agreement of Golden Pass LNG Terminal LLC and other authorities as necessary and have concluded that the proposed exportation of liquefied natural gas is within Golden Pass LNG Terminal LLC's corporate powers.

Respectfully submitted,

Signed by:

Mark R. Robeck

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Mark R. Robeck
Assistant General Counsel
Golden Pass LNG Terminal LLC

Appendix C:

Certified Statements of Authority

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

In The Matter Of:

Golden Pass LNG Terminal LLC

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Docket No. 25-__-LNG

CERTIFIED STATEMENT OF AUTHORIZED REPRESENTATIVE

Pursuant to 10 C.F.R. § 590.103(b) (2023), I, Mark R. Robeck, hereby certify that I am a duly authorized representative of Golden Pass LNG Terminal LLC, and that I am authorized to sign and file with the Department of Energy, Office of Fossil Energy and Carbon Management, on behalf of Golden Pass LNG Terminal LLC, the foregoing documents and in the above captioned proceeding.

Dated at Houston, Texas on this 26th day of June, 2025.

Signed by:



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Mark R. Robeck
Assistant General Counsel
Golden Pass LNG Terminal LLC
811 Louisiana Street, Suite 1500
Houston, TX 77002
713.324.6800
Email: mark.robeck@goldenpasslng.com
Attorney for Golden Pass LNG Terminal LLC

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

In The Matter Of:

Golden Pass LNG Terminal LLC


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Docket No. 25-___-LNG

CERTIFIED STATEMENT OF AUTHORIZED REPRESENTATIVE

Pursuant to 10 C.F.R. § 590.103(b) (2023), I, Jeff Hammad, hereby certify that I am a duly authorized representative of Golden Pass LNG Terminal LLC, and that I am authorized to sign and file with the Department of Energy, Office of Fossil Energy and Carbon Management, on behalf of Golden Pass LNG Terminal LLC, the foregoing documents and in the above captioned proceeding.

Dated at Houston, Texas on this 26th day of June, 2025.

Signed by:

E66775932C554B8

Jeff Hammad
Chief Commercial Officer
Golden Pass LNG Terminal LLC
811 Louisiana Street, Suite 1500
Houston, TX 77002
713.324.6800
Email: jeff.hammad@goldenpasslng.com