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Importation or Exportation of Liquefied Natural Gas or Electric Energy; Applications, Authorizations, etc.: Mexico Pacific Ltd. LLC

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General Comment

A coalition of environmental organizations and local Mexican communities expresses its firm opposition to the request submitted by Mexico Pacific Limited LLC to extend the deadline for the commencement of LNG export operations at the Saguaro Energía facility, located in Puerto Libertad, Sonora, Mexico, until December 14, 2032, as published in the Federal Register on July 8, 2025 (<https://www.federalregister.gov/documents/2025/07/09/2025-12763/mexico-pacific-limited-llc-application-for-an-amendment-to-extend-the-deadline-for-commencement-of>). This project represents a significant threat to the environment, local communities, and global efforts to combat climate change, and its approval should be reconsidered.

The Saguaro Energía project endangers the Gulf of California, a UNESCO World Heritage Site since 2005, a Migratory Bird Refuge since 1978, and a Biosphere Reserve since 1993 (<https://whc.unesco.org/en/list/1182>). This region hosts exceptional biodiversity, including 900 species of fish (90% endemic) and 39% of all marine mammal species, such as blue whales, whale sharks, and leatherback turtles (<https://www.nrdc.org/bio/joel-reynolds/mexico-pacifics-saguaro-lng-wrong-project-wrong-place>). The operation of 900-foot-long LNG tankers will increase the risk of collisions with these species and generate underwater noise pollution, which can disorient whales and drive them away from their habitats (<https://iucn-csg.org/wp-content/uploads/2024/12/2024-11-29-Carta-CSE-CMAP-proyecto-Saguaro-GLN-Mexico-ENG.pdf>). In addition, the discharge of contaminated ballast water and the risk of gas spills pose direct threats to the marine ecosystem, which represents approximately 50% of Mexico's total fish catch (<https://www.ls4ca.org/blog-show-all/legal-legacies-saguaro>).

The project threatens the livelihoods of local communities, particularly in La Paz, where marine wildlife-based tourism and fishing are essential to the local economy. Pollution and increased maritime traffic could significantly reduce these activities, affecting thousands of people (<https://bscicetos.org/>). Moreover, the Saguaro Connector pipeline, which will transport gas from the Permian Basin in Texas, endangers sacred sites of the Carrizo/Comecrudo Tribe, leading to opposition from Indigenous communities (<https://www.desmog.com/2024/02/15/saguaro-connector-pipeline-mexico-texas-carrizo-comecrudo-tribe-lng-export-oneok-inc/>). Border towns in Texas have also mobilized against the pipeline's construction and associated flaring, raising concerns about air quality and safety (<https://www.texastribune.org/2023/12/20/texas-saguaro-cross-border-natural-gas-pipeline/>).

The project aims to export 2.8 billion cubic feet of natural gas per day. Although often promoted as a cleaner alternative to coal, natural gas is primarily composed of methane — a greenhouse gas more than 80 times more potent than carbon dioxide over a 20-year period. Methane leaks during extraction, transport, and export would severely exacerbate the climate crisis and contradict Mexico's conservation commitments (<https://naturalgasintel.com/news/following-ferc-approval-oneok-eyeing-midyear-fid-for-saguaro-connector-natural-gas-pipeline/>). Furthermore, current LNG terminals are already responsible for 60 premature deaths and \$957 million in annual health costs due to air pollution. If all planned terminals, including Saguaro, are built, these figures could rise to 149 deaths and \$2.33 billion annually by 2030, and up to 4,470 deaths and \$62.2 billion by 2050 (<https://www.greenpeace.org/usa/permit-to-kill/>). These impacts highlight the project's incompatibility with global efforts to limit temperature rise to 1.5°C.

The project faces significant opposition from environmental groups and local communities. In June 2024, Sierra Club and Public Citizen filed a lawsuit against the Federal Energy Regulatory Commission (FERC) for restricting its analysis to the 1,000-foot connector pipeline at the border, ignoring the broader impacts of the main pipeline (<https://www.ls4ca.org/blog-show-all/legal-legacies-saguaro>). Earthjustice and the Mexican Center for Environmental Law (CEMDA) have also urged the Department of Energy to examine the specific harms associated with natural gas exports through Mexico. This opposition reflects widespread concerns about the environmental and social

risks of the project.

Given the scale of the environmental, social, and economic impacts, we urge the Department of Energy to deny the request to extend the deadline for the Saguaro Energía project. A thorough environmental assessment under the National Environmental Policy Act (NEPA) must be conducted to evaluate the cumulative risks to the Gulf of California, local communities, and the global climate. The protection of biodiversity, the rights of Indigenous communities, and the economic well-being of the region must take precedence over corporate interests.

Attachments

2024-11-29-Carta-CSE-CMAP-proyecto-Saguaro-GLN-Mexico-ENG