# **PUBLIC SUBMISSION**

As of: 8/11/25 7:02 PM Received: August 04, 2025 Status: Pending\_Post Tracking No. mdx-hflz-251o Comments Due: August 08, 2025 Submission Type: API

**Docket:** DOE-HQ-2025-0240

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

Comment On: DOE-HQ-2025-0240-0001

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

**Document:** DOE-HQ-2025-0240-DRAFT-0460

Comment on FR Doc # 2025-12763

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## **General Comment**

The Gulf of California is a UNESCO World Heritage site—designated "in danger" since 2019, hosting nearly 40 % of the world's marine mammal species, including endangered blue, fin, humpback and sperm whales, sea turtles, and the critically endangered vaquita porpoise

#### Environmentally:

Besides the known ship strikes and possible collision with fauna, acoustic disturbance, & ecosystemic degradation, we are facing

- Vaquita extinction risk: Only 6-10 individuals remain in the whole world, they reside in the upper Gulf and face exponential risk from industrial activity and vessel traffic
- Greenhouse Gas Impact: Saguaro's full life-cycle emissions are estimated at 73 to 83 million metric tons CO<sub>2</sub> equivalent per year, exceeding the combined emissions of Sweden and Portugal—and representing over 10 % of Mexico's annual emissions.
- Methane leaks from fracked gas are up to  $80\times$  more warming than  $CO_2$  in the short term.

### Legally:

The project is currently blocked by multiple legal injunctions in Mexico and the U.S., including lawsuits against FERC's approval of the Saguaro Connector Pipeline, citing insufficient environmental review.

#### Financially

Independent market analyses warn of financial non-viability: cost overruns, volatile LNG demand trends, and a looming global supply glut forecast to materialize from 2027 onward

Major financiers and advisors—including JPMorgan Chase, MUFG, Santander—face scrutiny for potentially breaching their own sustainability frameworks (Equator Principles, ESG policies) by participating in this project

Proponents argue that Saguaro offers shorter shipping routes to Asia and generates local economic development. Yet:

- Export-only infrastructure bypasses any local energy-security benefit.
- Projected jobs and revenues are outweighed by irreversible damage to fisheries that sustain > 60 % of Mexico's seafood output and coastal livelihoods

# The path to take is to

- 1. Deny approval for any U.S.-related export permits, pipeline authorizations, and infrastructure support.
- 2. Require a full, transboundary Environmental and Social Impact Assessment consistent with UNESCO World Heritage concerns and the Equator Principles.

3. Explore alternative pathways focused on renewable cross-border investments.			