

PUBLIC SUBMISSION

As of: 8/11/25 7:02 PM
Received: August 06, 2025
Status: Pending Post
Tracking No. mdz-jsae-vd9q
Comments Due: August 08, 2025
Submission Type: API

Docket: DOE-HQ-2025-0240

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

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

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

Document: DOE-HQ-2025-0240-DRAFT-0488

Comment on FR Doc # 2025-12763

Submitter Information

Name: Evelyn Callihan

Address: United States,

Email: evelyn.callihan@gmail.com

General Comment

I urge the Department of Energy (DOE) to deny this extension due to the profound environmental, climate, and economic risks posed by the Saguaro project.

The Saguaro project, which involves the re-export of U.S.-sourced natural gas in the form of liquefied natural gas (LNG) from a proposed facility in Sonora, Mexico, to non-free trade agreement countries, is fundamentally at odds with critical environmental protection and climate change mitigation goals.

Reasons for Opposition:

1. Devastating Environmental Impact on the Gulf of California's Unique Biodiversity:

- The project's infrastructure and associated transport route are proposed for the heart of the Gulf of California, an area recognized globally for its conservation value. It was designated a World Heritage Site by UNESCO in 2005, a Biosphere Reserve by Mexico in 1993, and a Migratory Bird Refuge in 1978.
- Often called the "Aquarium of the World" or the "Serengeti of the Sea," the Gulf of California is a "natural laboratory for the investigation of speciation" with "extraordinary importance for study". It is home to 695 vascular plant species (more than any marine World Heritage site), 891 fish species (90 endemic), 39% of the world's total marine mammal species, and a third of the world's marine cetacean species.
- The Saguaro project poses significant risks to this sensitive ecosystem.

Increased vessel traffic and underwater noise from industrial activities would severely disrupt marine life, particularly large whales, which are highly vulnerable to vessel impacts. Noise pollution also interferes with cetaceans' ability to communicate, navigate, and feed.

The project is likely to impact local fisheries and tourism. Increased underwater noise and vessel activity can disrupt fish behavior and spawning areas, affecting fishing communities and the tourism industry.

The release of fuel, lubricants, and other chemicals during vessel operations could degrade water quality and marine habitats, threatening vital economic sectors and livelihoods.

- This industrialization of a globally recognized natural gem would transform the Gulf from an area of iconic biodiversity into a "sacrifice zone of fossil fuel development for decades to come".

2. Exacerbation of Global Climate Change:

- The Saguaro project is fundamentally at odds with the phase-out of fossil fuels deemed essential by the international community to address global climate change.
- A life cycle analysis indicates that the first phase of Saguaro would generate 73 MTCO₂e per year and 1460 MTCO₂e over a 20-year lifespan, equivalent to 17.4 million additional vehicles per year.
- The claim that LNG reduces greenhouse gas (GHG) emissions is misleading. While the project notes a shorter shipping route to Asia, the broader concern is that LNG facilities are "inherently leaky operations and prodigious emitters of methane," a potent climate super-pollutant.
- Methane leaks throughout the entire LNG supply chain—from production to pipeline transportation, liquefaction, vessel transportation, regasification, distribution, and end-use consumption—likely eliminate any climate advantage of reduced carbon dioxide emissions.
- According to peer-reviewed analysis, the greenhouse gas footprint for LNG as a fuel source is 33% greater than that for coal when analyzed over 20 years (Global Warming Potential), and it equals or exceeds coal's footprint even over a 100-year timeframe.
- A multi-decade investment in fossil fuel infrastructure, as required by the Saguaro project, is irreconcilable with the urgency of our climate crisis and the achievement of international goals for greenhouse gas emission reductions.

3. Significant Economic Risks for Mexico:

- Beyond the direct impacts on local fishing and tourism industries, the Saguaro project poses broader economic risks to Mexico.
- Investing in multi-billion-dollar LNG export infrastructure risks locking Mexico into a decades-long bet on volatile LNG markets, rather

than promoting sustainable renewable energy alternatives that offer job creation, energy security, and other economic and social opportunities.

- The world is on pace to add an unprecedented volume of new LNG export capacity, while demand in Europe and Japan is falling, and demand growth in emerging Asian markets is increasingly uncertain due to price competition from less costly renewable energy alternatives.
- This oversupply could lead to lower prices and slimmer profits for LNG suppliers, making it an unsound economic bet for Mexico's energy security and commitments under the Paris Climate Accord.

Granting an extension for this project would contradict the principles of environmental protection and sustainable development.