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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

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Submitter Information

Name: Anonymous Anonymous

General Comment

Notice Title:

Mexico Pacific Limited LLC; Application for an Amendment To Extend the Deadline for Commencement of Export Operations in Long-Term Authorization To Re-Export Liquefied Natural Gas

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Comment:

To Whom It May Concern,

I respectfully submit this anonymous public comment regarding the request by Mexico Pacific Limited LLC to amend its existing authorization by extending the deadline for commencement of liquefied natural gas (LNG) re-export operations.

The Department of Energy (DOE) must consider the climate implications—particularly carbon dioxide (CO₂) emissions—associated with the expansion or extension of LNG export infrastructure. While this request may appear to be a procedural adjustment, such extensions have significant downstream climate consequences that implicate the DOE's obligation to assess whether continued export activity is consistent with the public interest.

Key Points:

1. LNG Projects Must Be Reassessed in a Changed Climate Context

The authorization at issue was granted under economic and environmental assumptions that may no longer reflect the current policy environment or scientific consensus on climate risk. Extending the export deadline without reassessing the cumulative greenhouse gas (GHG) emissions would be a failure to account for newly available data and evolving public interest considerations.

2. DOE Must Weigh CO₂ Emissions in Public Interest Determinations

Under the Natural Gas Act, DOE is required to determine whether LNG export activities are consistent with the public interest. The climate and environmental consequences of LNG exports—including lifecycle CO₂ emissions—must be part of this analysis. To date, the Department has insufficiently integrated full-cost accounting of carbon into its export extension reviews.

3. Export Extensions Are Not Administrative Formalities

While extensions are often treated as administrative matters, they are in fact key inflection points where the agency can and should evaluate whether continued facilitation of LNG exports aligns with both national energy priorities and global climate objectives. Any decision made without accounting for projected GHG emissions lacks the rigor needed to support a credible public interest finding.

Recommendation:

The Department should require:

A revised lifecycle carbon analysis for the full export operation, including upstream methane leakage, liquefaction energy use, marine transport, and downstream combustion.

A transparent public interest review incorporating current science, policy, and economic conditions.

An evaluation of whether the net climate impact of the proposed extension undermines broader U.S. climate commitments and public health protections.

The opportunity to revisit export authorizations—especially before projects become operational—is a critical regulatory checkpoint. DOE must not miss this chance to ensure that fossil fuel exports are subject to full environmental scrutiny.

Sincerely,

A Concerned Citizen

Submitted Anonymously

Date: August 5, 2025