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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

I am writing to submit the following comments for consideration in the Department of Energy's review of Mexico Pacific Limited LLC's application to amend its long-term authorization for the re-export of liquefied natural gas (LNG) from Mexico.

The three proposed LNG export terminal projects in the Gulf of California (GOC)—Vista Pacifico LNG, AMIGO LNG (American Mexican Integrated Gas Operations), and Saguaro Energía LNG (also known as Mexico Pacific LNG)—will have significant environmental and socio-economic impacts. The anticipated increase in vessel traffic would likely cause substantial air and water pollution, as well as heightened underwater noise, posing serious threats to the region's rich marine biodiversity, whale habitats, local fisheries (which provide the largest share of Mexico's fishing resources), and the health and well-being of coastal communities.

A scientific report on the potential impacts of LNG development on marine mammals in the Gulf of California ([link](#)) underscores the global significance of this ecosystem. The GOC contains federally protected marine and terrestrial conservation areas of international importance, including UNESCO World Heritage Sites and Important Marine Mammal Areas recognized by the International Union for Conservation of Nature (IUCN). Its ecosystems sustain more than 55% of Mexico's national fisheries production and support a thriving marine ecotourism industry, generating 896,000 annual visits, USD 518 million in expenditures, and 3,575 direct jobs through 256 formal operators.

Existing anthropogenic threats to whales include vessel strikes, entanglements, acoustic pollution, and broader impacts from habitat degradation and climate change, such as reduced prey availability, marine contamination, and disease. The introduction of additional large-scale LNG shipping traffic will significantly increase the risk of fatal collisions with whales and other marine mammals. Although LNG spills are rare, any loss of cargo has the potential for severe environmental harm. Methane (CH₄) leakage during transport contributes directly to cargo loss and requires specialized capture and mitigation systems; continuous methane emissions from LNG carriers are well-documented and exacerbate the climate crisis.

Underwater noise pollution is another major concern. Persistent and high-intensity noise can cause temporary or permanent hearing loss in marine mammals, disrupt communication, feeding, and breeding behaviors, and force displacement from critical habitats. Even moderate noise levels may mask essential biological sounds, increasing stress and energy expenditure.

In addition, LNG carriers emit CO₂, CH₄, NO_x, and particulate matter (PM₁₀, PM_{2.5}), all of which contribute to climate change and harm human health. Wastewater discharges—including ballast water, grey water, black water, and bilge water—further threaten ocean health by introducing harmful bacteria, chemicals, and invasive species.

The ecological integrity of the Gulf of California is fundamentally incompatible with the scale and nature of heavy maritime traffic associated with these LNG projects. Approving an extension that facilitates their implementation would place globally significant marine biodiversity, local livelihoods, and climate stability at unacceptable risk.

For these reasons, I respectfully urge the Department of Energy to carefully consider the cumulative environmental, economic, and climate impacts before granting any extension to Mexico Pacific Limited LLC's long-term LNG re-export authorization.

Thank you for the opportunity to provide these comments for the official record.

Sincerely,
Silvana