

EXHIBIT 1

Declaration of CEMDA Attorney Úrsula Garzón Aragón.

**UNITED STATES OF AMERICA
DEPARTMENT OF ENERGY
OFFICE OF FOSSIL ENERGY AND CARBON MANAGEMENT**

In the matter of

Mexico Pacific Limited, LLC

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Docket No. 18-70-LNG

DECLARATION OF CEMDA ATTORNEY ÚRSULA GARZÓN ARAGÓN

1. My name is Úrsula Garzón Aragón, I am a Mexican attorney and the *gerente de defensa* [Defense Director] at the *Centro Mexicano de Derecho Ambiental* [Mexican Center for Environmental Law] (“CEMDA”), where I have worked for the past 15 years.
2. CEMDA is a public interest, non-profit organization incorporated in Mexico, that has worked for more than 30 years promoting and defending the human right to a healthy environment and Mexico’s natural heritage. Since its founding, CEMDA has worked in 23 states of the republic, collaborating with more than 200 civil society organizations, producing more than 100 publications on issues such as water, air, energy, climate change, human rights, and environmental defense. We have represented individuals, communities, and organizations in multiple legal proceedings, achieving more than 100 relevant precedents in environmental matters.
3. One of CEMDA’s largest regional offices is in La Paz, Baja California Sur at the southern end of the Gulf of California. We have represented and served communities from across the region of the Baja California peninsula and the Gulf of California, including the states of Baja California Sur, Baja California, Sonora, Sinaloa, and Nayarit. We have supported farmer and indigenous communities of the Yaqui People in Sonora and helped defend 7,000 hectares of the Cabo Pulmo marine reserve, as well as 2,500 hectares of beach, sea, and mangroves in Balandra, Baja California Sur.

A. The Project’s Impact for CEMDA and the region of the Gulf of California.

4. We believe that the proposed Saguaro Energy Facility, also known as the *Terminal GNL de Sonora*/Sonora LNG Terminal, promoted by Mexico Pacific Limited LLC (“MXP”) and its affiliates, including Mexico Pacific Land Holdings S. de R.L. de C.V and others, poses serious risks for the environment and climate in Mexico and the region of the Gulf of California.

5. The Gulf is a vital ecosystem for marine biodiversity and coastal communities in Mexico. It has been dubbed “the world’s aquarium” due to its unique biological diversity. It is a UNESCO World Heritage Site, contains 30 wetlands of international importance protected under the Ramsar Convention, 26 natural protected areas under Mexican law, and 46 areas for the Importance of Bird Conservation.
6. Our most serious concern is with the project’s potential impact to over 30 species of large marine mammals for which the Gulf of California is a critical habitat. A recent study by the *Universidad Autónoma de Baja California Sur* [Autonomous University of Baja California Sur] found that increased tanker traffic from the project could cause serious impacts to whales and dolphins due to ship strikes and underwater acoustic noise. The report concluded that because of these impacts, the Gulf of California (“GOC”) “would cease to be a suitable area for the reproduction and feeding of migratory species that depend on the GOC,” and recommended that “the liquefaction plant in Puerto Libertad not be built, thus preventing methane tankers from navigating through the region of the Great Islands.”
7. We are also concerned with the increased greenhouse gas emissions that this project would create, and that these would significantly hinder Mexico’s progress toward emissions targets under the Paris Agreement. A recent lifecycle analysis of the MXP project estimated that the total annual emissions would be approximately 73 MtCO₂e, which is the equivalent of 17.34 million small cars driven over the course of a year. The annual emissions directly attributable to Mexican territory would be about 5.4 MtCO₂e, which is approximately 38% of the GHG reductions necessary for Mexico to meet its emissions reduction targets for the oil and gas sector by 2030, according to Mexico’s latest Nationally Determined Contribution.
8. Over the past several years, CEMDA has engaged in advocacy to stop the development of gas infrastructure in the Gulf of California and to ensure the proper enforcement of Mexico’s Constitution and federal laws. Through this work, we have uncovered information that is important for the Department of Energy to consider when reviewing MXP’s application for extension of its export permit.

B. The Project’s Environmental Permitting Process under Mexican Federal Law.

9. MXP’s LNG terminal project began at least 19 years ago as a regassification terminal intended to import natural gas from Australia, Alaska, Indonesia, Malaysia and the Middle East. The owner of the project at the time, Terminal GNL de Sonora S. de R.L. de C.V., filed its *Manifestación de Impacto Ambiental* [Environmental Impact Statement] (“MIA”) on June 7, 2006, which was published by the *Secretaría de Medio Ambiente y Recursos Naturales* [Secretary of the Environmental and Natural Resources] (“SEMARNAT”) on June 8, 2006.

10. The MIA is the primary document through which SEMARNAT evaluates a project's environmental impact. The approval of the MIA constitutes the main environmental permit for a project under federal law. Under Mexican law, the preparation of the MIA and the compliance with any conditions SEMARNAT imposes on an approved MIA are the sole responsibility of the project promotor.
11. SEMARNAT granted environmental approval for the Sonora LNG Terminal on November 16, 2006, through an official letter numbered S.G.P.A./DIGIRA.DDT.2277.06. This environmental permit is the same permit that MXP relies on today for its environmental approval under Mexican federal law.
12. In October 2017, Terminal GNL de Sonora S. de R.L. de C.V. transferred its rights in the Sonora LNG Terminal project and the environmental permit numbered S.G.P.A./DIGIRA.DDT.2277.06 to México Pacific Land Holdings, S. de R.L. de C.V.
13. On May 28, 2018, Mexico Pacific Land Holdings, S. de R.L. de C.V. requested a modification of the environmental permit for the Sonora LNG Terminal project, seeking to change the proposed terminal from a regassification plant to a liquefaction plant. It requested this modification through the *Agencia Nacional de Seguridad Industrial y de Protección al Medio Ambiente del Sector Hidrocarburos* [National Agency for Industrial Safety and Environmental Protection in the Hydrocarbons Sector] ("ASEA"), which is the office in SEMARNAT which reviews and supervises oil and gas infrastructure projects, among other activities.
14. ASEA initially rejected the modification request in an official letter numbered ASEA/UGI/DGGPI/1219/2018 and dated June 14, 2018. ASEA found that the new proposal "completely chang[es] the nature of the project for which the authorization for the construction and operation was granted," and required Mexico Pacific Land Holdings to restart the environmental approval process by filing a new MIA for a liquefaction plant.
15. Undeterred, Mexico Pacific Land Holdings refiled its modification request again on July 25, 2018. Contradicting its earlier decision, ASEA approved the new modification request on August 9, 2018 in an official letter numbered ASEA/UGI/DGGPI/1629/2018, allowing the environmental permit for the Sonora LNG Terminal project to be modified from a regassification terminal to a liquefaction terminal without a new environmental review.
16. In a very unusual reversal, on October 24, 2023, ASEA approved a second modification of the project in an official letter numbered ASEA/UGI/DGGPI/2481/2023, which authorized an extension of the timeline for the original permit to 37 years.
17. Under Mexican law, the 2006 environmental permit numbered S.G.P.A./DIGIRA.DDT.2277.06 is still the primary federal environmental permit for the project. The august 2018 and the October 2023 decisions merely modified the original 2006 permit.

C. *Legal Challenges and Suspension of the Project's Environmental Permit.*


18. In June 2024, CEMDA, together with other non-profit, public interest organizations, filed a constitutional injunction action known as an “*amparo*” against ASEA seeking to enjoin execution of ASEA’s modification approval in its official letter ASEA/UGI/DGGPI/1629/2018 dated August 9, 2018. The *amparo* lawsuit alleged that the modification’s approval violated the human right to a healthy environment recognized in the Mexican constitution and international human rights treaties ratified by Mexico. Specifically, the *amparo* complaint alleged that the change from a regassification plant to a liquefaction plant was a significant change in the nature of the project, requiring a new MIA and environmental impact evaluation.
19. On November 14, 2024, the Fourteenth District Court of the State of Sonora notified CEMDA and other plaintiffs in the lawsuit that it had suspended our *amparo* action because the ASEA’s modification had already been affected by an order of a *suspensión definitiva* [definitive suspension] (the equivalent of a preliminary injunction) from the court in a separate *amparo* lawsuit.
20. CEMDA is not a party to this separate *amparo* lawsuit. The information we have of the lawsuit and the resulting definitive suspension comes from the official judicial notice we received, public information available on the website of the Federal Judiciary Council of Mexico, and the response to a request for information we filed.
21. The definitive suspension came from a March 14, 2024 ruling of the Fourteenth District Court of the State of Sonora and effectively halts activities related to the official letter S.G.P.A./DIGIRA.DDT.2277.06 of November 16, 2006, which granted the project’s environmental permit. The plaintiffs in this case alleged three omissions by ASEA had violated their constitutional rights:
 - “1] Failure to verify that the ‘Baseline Study for the Biotic Characterization of the Marine Environment near Puerto Libertad’ and the ‘Marine Noise Environmental Monitoring Plan’ complied with mitigation measures; in accordance with the first condition of the sixth term of official letter S.P.G.A./DGIRA.DDT.2277.06 dated November 16, 2006, [which] authorized the project entitled ‘[NAME REDACTED]’.*
 - 2] Failure to verify that the conditions established in the authorization of the environmental impact statement have been met.*
 - 3] Failure to supervise, inspect, and monitor that the regulated party has begun construction, without having given notice of this, as provided for in the eighth term of the aforementioned official letter.”*
22. It is important to note that while the lawsuit is challenging the actions of Mexican authorities, the compliance with the conditions in official letter S.P.G.A./DGIRA.DDT.2277.06 of November 16, 2006 are the responsibility of the project promoter, that is, Mexico Pacific Land Holdings.

23. The effect of the definitive suspension is to temporarily halt the execution of activities approved in ASEA's approvals in the official letter S.G.P.A./DIGIRA.DDT.2277.06 of November 16, 2006. In practical terms, this means that while the definitive suspension is in effect, the project's promoters cannot execute activities regarding the construction or operation of the proposed project. Although the ruling is not a final determination on the merits of the plaintiff's claims, it is a judicial determination that there is a colorable claim that the project's environmental permit threatens rights guaranteed under the Mexican Constitution and the environment.
24. If these lawsuits prevail, the court will likely order the revocation of the official letter S.G.P.A./DIGIRA.DDT.2277.06 of November 16, 2006 and/or official letter ASEA/UGI/DGGPI/1629/2018 of August 9, 2018. This would mean that the proposed project would not be able to continue without significant revisions. This could include the preparation of an entirely new MIA, which under Mexican law is the sole responsibility of the project promoter, Mexico Pacific Land Holdings.
25. The definitive suspension will be in place unless it is overturned on appeal or until the district court reaches a final determination on the merits. It is unclear how much longer the litigation will take to resolve. In our experience, definitive suspensions have lasted for several years while litigation is ongoing. Even if the present definitive suspension is eventually overturned, the federal courts will still have to review and rule on the separate *amparo* lawsuit that we filed before activities on the project can continue.
26. CEMDA remains committed to ensuring the proper enforcement of the human right to a healthy environment and Mexican federal and constitutional rights for all Mexican citizens and communities in the region of the Gulf of California. We believe that the above information is highly relevant for the Department of Energy's consideration of MPX's application.

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Pursuant to 10 C.F.R. § 590.103(b) and 28 U.S.C § 1746, I, Úrsula Garzón Aragón, hereby verify under penalty of perjury under the laws of the United States of America, that I am authorized to execute this verification, that I have read the above declaration, and that the facts stated therein are true and correct to the best of my knowledge.

Executed in Mexico City, Mexico on August 4, 2025



Úrsula Garzón Aragón
Gerente de Defensa
CEMDA