

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

Southern LNG Company, L.L.C.	)	Docket Nos. 12–54–LNG
	)	12–100–LNG
	)	23-109-LNG

**SUPPLEMENT TO APPLICATION OF SOUTHERN LNG COMPANY, L.L.C. TO
AMEND ITS LONG-TERM, MULTI-CONTRACT AUTHORIZATION TO EXPORT
NATURAL GAS TO FREE TRADE AGREEMENT AND NON-FREE TRADE
AGREEMENT NATIONS TO INCLUDE EXPORTS OF LNG BY SHIP-TO-SHIP
TRANSFERS WITHIN THE TERRITORIAL SEAS AND PORTS OF FOREIGN
COUNTRIES**

Southern LNG Company, L.L.C. (“Southern LNG ”) hereby provides the supplemental filing clarifying its request made on July 31, 2025, that DOE’s Office of Fossil Energy and Carbon Management (“DOE/FECM”) amend the authorizations granted in DOE/FECM Order Nos. 3106–A and 3956–A (the “Existing Authorizations”) ¹ to add transfers of U.S.-sourced LNG in bunkering operations conducted within the territorial seas of foreign countries (including ports of such foreign countries) to the categories of activities to which those authorizations apply (“Original Amendment Application”). Southern LNG hereby makes this supplemental request to (i) add a docket to the Original Amendment Application and to request that DOE/FECM authorize the actions requested in the Original Amendment Application as part of its order in that proceeding; and (ii) clarify certain aspects of its original request which was made pursuant to Section 3 of the Natural Gas Act of 1938, as amended (“NGA”) ² and Part 590 of the Department of Energy’s (“DOE”) regulations. ³

¹ *Southern LNG Company, L.L.C.* DOE/FE Order Nos. 3106 and 3106-A (June 15, 2012 and Dec. 30, 2020); *Southern LNG Company, L.L.C.*, DOE/FECM Order No. 3956 and 3956-A (Dec. 16, 2016 and Dec. 30, 2020).

² 15 U.S.C. § 717b (2018).

³ 10 C.F.R. Part 590 (2023).

The Existing Authorizations grant Southern LNG long-term, multi-contract authorization to export up to 182.5 billion cubic feet (“Bcf”) of natural gas per year from domestic sources in the form of liquefied natural gas (“LNG”) to: (1) any country with which the United States has, or in the future may enter into, a free trade agreement requiring national treatment for trade in natural gas (“FTA nations”) and (2) any country with which the United States does not have a free trade agreement requiring national treatment for trade in natural gas, which currently has or in the future develops the capacity to import LNG and with which trade is not prohibited by United States law or policy (“non-FTA nations”), for a term ending on December 31, 2050. By this application (the “Supplemental Amendment Application”), Southern LNG respectfully requests to clarify the Original Amendment Application as follows:

1. Southern LNG clarifies that the “bunkering events” as such term is used in the Original Amendment Application would include not only ship to ship transfers but also transfer of LNG into approved ISO containers which are then boarded onto vessels.

2. Southern LNG acknowledges and clarifies that Southern LNG does not qualify under the “small-scale natural gas exports” rule codified at 10 C.F.R. § 590.208(a), as incorrectly stated in the Original Amendment Application, and that the appropriate categorical exclusion would be categorical exclusion B5.7.⁴

I. BACKGROUND

Southern LNG has been exporting LNG in approved via ocean-going carrier, primarily to any FTA and Non-FTA countries since December 13, 2019.⁵ While such exports initially occurred pursuant to authorizations issued in 2012 and 2016,⁶ Southern LNG submitted an application on

⁴ See 10 C.F.R. Part 1021, Subpt. D, App. B, Categorical Exclusion B5.7.

⁵ Southern LNG’s corporate information is unchanged from what was included in the September 25, 2023 application; that information is incorporated herein by reference.

⁶ *Southern LNG Company, L.L.C.* DOE/FE Order Nos. 3106 and 3106-A (June 15, 2012 and Dec. 30, 2020);

November 4, 2020, in DOE/FECM Docket Nos. 12–54–LNG and 12–100–LNG, requesting that DOE/FECM issue an authorization to replace its prior authorization, that the period of such authorization run until December 31, 2050. DOE/FECM granted those requests on December 30, 2020.⁷ On September 25, 2023, Southern LNG filed an application in Docket No. 23-109-LNG requesting authorization for Southern LNG to engage in additional long-term, multi-contract exports of LNG in an amount up to 28.25 billion cubic feet (“Bcf”) per year (“Bcf/y”) from its existing LNG terminal, located in Chatham County, Georgia (known as the “Elba Island Terminal”), for a term extending through December 31, 2050. On July 31, 2025, Southern LNG filed the Original Amendment Application.

II. CLARIFICATION TO AMENDMENT REQUESTED

Consistent with DOE/FECM announcement that, under Section 3 of the Natural Gas Act, as amended, “DOE has jurisdiction over LNG transferred to a receiving ship for use as marine fuel when the receiving ship is not only located in an international port, but more broadly when the receiving ship is located anywhere in a foreign country’s territorial sea (which is considered part of that country’s sovereign territory),”⁸ Southern LNG filed the Original Amendment Application requesting that DOE/FECM grant it the same authorization to export LNG through deliveries in bunkering events taking place in the territorial seas of foreign countries (including foreign ports) that it recently granted to JAX LNG, LLC. Southern LNG requests DOE/FECM accept the above clarifications and incorporate them into the Original Amendment Application.

Southern LNG Company, L.L.C., DOE/FECM Order Nos. 3956 and 3956-A (Dec. 16, 2016 and Dec. 30, 2020).

⁷ See DOE/FE Order Nos. 3106–A and 3956–A (Dec. 30, 2020).

⁸ *JAX LNG, LLC*, DOE/FECM Order No. 5233-A, Docket No. 24-73-LNG, Order Granting Request for Rehearing and Clarification and Modifying Order (Feb. 25, 2025).

III. COMMUNICATIONS

All correspondence and communications regarding this Supplemental Amendment

Application should be directed to:

Patricia S. Francis
Vice President – Managing Counsel
Southern LNG Company, L.L.C.
569 Brookwood Village, Suite 600
Birmingham, Alabama 35209
(205) 325-7696
patricia_francis@kindermorgan.com

Tina Hardy
Director – Regulatory
Southern LNG Company, L.L.C.
569 Brookwood Village, Suite 600
Birmingham, Alabama 35209
(205) 325-3787
tina_hardy@kindermorgan.com

IV. APPENDICES

The following appendices are included herewith:

Appendix A: Verification

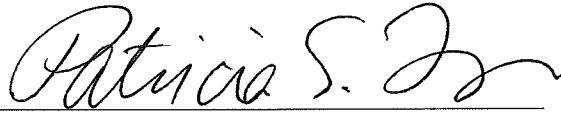
Appendix B: Certificate of Service

VII. CONCLUSION

For the reasons set forth above and in the Original Amendment Application, Southern LNG respectfully requests that DOE/FECM accept the proposed clarifications hereunder and issue an order amending Southern LNG's Existing Authorizations and to amend its application in Docket No. 23-109-LNG so as to permit Southern LNG to export natural gas in the form of LNG to FTA and non-FTA nations (i) in approved ISO containers loaded in such containers onto vessels, and (ii) in bulk, loaded into bunkering vessels for transfer as marine fuel to ships located within the territorial sea of a foreign country (including ships located in foreign ports), for a term ending December 31, 2050. Southern LNG further requests that DOE/FECM (i) confirm that Southern LNG's proposed approach to the reporting of exports affected through bunkering operations conducted in the territorial sea of a foreign country (including that country's ports) described under

heading III above is acceptable, and (ii) identify any other information it expects to be included in monthly reports describing such exports.

Respectfully submitted,

A handwritten signature in black ink, reading "Patricia S. Francis". The signature is written in a cursive style with a horizontal line underneath the name.

Patricia S. Francis

Attorney for

Southern LNG Company, L.L.C.

Dated: September 11, 2025

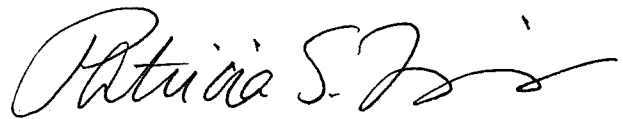
Appendix A Verification

VERIFICATION

State of Alabama)

County of Jefferson)

BEFORE ME, the undersigned authority on this day personally appeared Patricia S. Francis , who, having first by me been duly sworn, says she is the Vice President – Managing Counsel for Southern LNG Company, L.L.C. and is duly authorized to make this Verification; that she has read the forgoing instrument and that the facts therein stated are true and correct to the best of her knowledge, information, and belief.



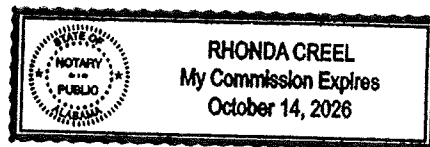
Patricia S. Francis
Southern LNG Company, L.L.C.

SWORN TO and SUBSCRIBED on this 11th day of September, 2025.



NAME: Rhonda Creel
TITLE: Notary Public

Commission Expires: October 14, 2026



CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing document upon the intervenors for FECM Docket Nos. 12-54-LNG, 12-100-LNG and 23-109-LNG in accordance with 10 CFR § 590.107(b).

Dated in Birmingham, AL this 11th day of September, 2025.

A handwritten signature in black ink, appearing to read "Patricia S. Francis", with a stylized flourish at the end.

Patricia S. Francis
Southern LNG Company, L.L.C.
P.O. Box 2563
Birmingham, Alabama 35202-2563
patricia_francis@kindermorgan.com