

**ECA Liquefaction, S. de R.L. de C.V.** )      **FE Docket No. 18-144-LNG**

**REQUEST OF ECA LIQUEFACTION, S. DE R.L. DE C.V. FOR EXTENSIONS FOR  
LONG-TERM AUTHORIZATIONS TO EXPORT LIQUEFIED NATURAL GAS**

Pursuant to section 3 of the Natural Gas Act (“NGA”), 15 U.S.C. § 717b, and Part 590 of the regulations of the Department of Energy (“DOE”), 10 C.F.R. pt. 590, ECA Liquefaction, S. de R.L. de C.V. (“ECA Liquefaction”) submits this request to the DOE Office of Fossil Energy and Carbon Management (“DOE/FECM”) for an extension of the deadlines applicable to the authorizations issued to ECA Liquefaction in Order No. 4317, as amended by Order Nos. 4317-A and 4314-B (“FTA Authorization”), and Order 4364, as amended by Order Nos. 4364-A and 4364-B (“Non-FTA Authorization”), in FE Docket No. 18-144-LNG. Specifically, ECA Liquefaction requests that DOE/FECM (a) eliminate the specific start date for the authorization term under the FTA Authorization and set the term to begin on the date of first commercial export of liquefied natural gas (“LNG”); and (b) extend the deadline for commercial export of LNG under the Non-FTA Authorization to September 21, 2026. ECA Liquefaction submits that good cause exists to grant the requested extensions and that such extensions are consistent with the public interest. ECA Liquefaction respectfully requests that the DOE/FECM act on this request within a period not to exceed 90 days after the date hereof, i.e., December 18, 2025.

## I. Background

On January 25, 2019, DOE/FECM issued the FTA Authorization in FE Docket No. 18-144-LNG granting authorization to ECA Liquefaction's affiliate and predecessor-in-interest to

export natural gas to Mexico in the total requested volume of 182 Bcf/yr, which includes export by pipeline (21 Bcf/yr) and re-export after liquefaction in Mexico to FTA countries (161 Bcf/yr).<sup>1</sup> With respect to the start of the term, Order No. 4317 states: “The volume authorized in this Order is up to the equivalent of 182 Bcf/yr of natural gas for a 20-year term, beginning on the earlier of the date of first export or seven years from the date the authorization is issued (January 25, 2026).”<sup>2</sup>

On March 29, 2019, the DOE/FECM issued the Non-FTA Authorization in FE Docket No. 18-144-LNG, authorizing ECA Liquefaction’s affiliate and predecessor-in-interest to export 161 Bcf/yr of LNG from the project to non-free trade agreement (“Non-FTA”) nations.<sup>3</sup> The Non-FTA Authorization states: “ECA must commence re-export operations using the planned liquefaction facilities no later than seven years from the date of issuance of this Order.”<sup>4</sup> That deadline is March 26, 2026.

On October 7, 2019, DOE/FECM issued Order Nos. 4317-A and 4364-A in FE Docket No. 18-144-LNG granting the request to transfer the FTA and Non-FTA Authorizations to ECA Liquefaction.<sup>5</sup> DOE/FECM subsequently extended the term of the FTA and Non-FTA authorizations to December 31, 2050.<sup>6</sup>

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<sup>1</sup> *Energia Costa Azul, S. de R.L. de C.V.*, DOE/FE Order No. 4317, FE Docket No. 18-144-LNG (Jan. 25, 2019).

<sup>2</sup> Order No. 4317 at 12.

<sup>3</sup> *Energia Costa Azul, S. de R.L. de C.V.*, DOE/FE Order No. 4364, FE Docket No. 18-144-LNG (Mar. 29, 2019).

<sup>4</sup> Order No. 4364 at 52.

<sup>5</sup> *ECA Liquefaction, S. de R.L. de C.V.*, DOE/FE Order Nos. 4317-A & 4364-A, FE Docket No. 18-144-LNG (Oct. 7, 2019).

<sup>6</sup> *ECA Liquefaction, S. de R.L. de C.V.*, DOE/FE Order Nos. 4317-B & 4364-B, FE Docket No. 18-144-LNG (Dec. 10, 2020).

## **II. Communication**

All correspondence and communication concerning this amendment application should be directed to the following people:

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## **III. Request for Commencement Extensions**

Ordering paragraph A of Order No. 4317 sets the start date of the term of the FTA Authorization as beginning on the earlier of the date of first export or seven years from the date of the order (i.e., January 25, 2026).

Ordering paragraph D of Order No. 4364 requires ECA Liquefaction to commence re-export operations under the Non-FTA Authorization no later than seven years from the date of the order (i.e., March 29, 2026).

ECA Liquefaction hereby respectfully requests that DOE/FECM amend ordering paragraph A of Order No. 4317 to remove the deadline associated with ECA Liquefaction's FTA Authorization and to establish the commencement of the term as the date of first export, consistent with DOE/FECM precedent.<sup>7</sup> ECA Liquefaction further respectfully requests that the deadline for the commencement of service for Non-FTA exports pursuant to Order No. 4364 be changed to September 21, 2026.

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<sup>7</sup> See, e.g., *Port Arthur LNG, LLC*, DOE/FECM Order No. 3698-C & 4372-B, Docket Nos. 15-53-LNG, 15-96-LNG, 18-162-LNG at 4-5 (Apr. 21, 2023).

#### **A. FTA Authorization (Order No. 4317 *et al.*)**

With respect to its FTA Authorization in Order No. 4317, as amended, ECA Liquefaction requests that DOE/FECM grant the requested change to the export commencement deadline without modification or delay.

Under section 3(c) of the NGA, an application for authorization to export natural gas, including LNG, to any “nation with which there is in effect a free trade agreement requiring national treatment for trade in natural gas, shall be deemed to be consistent with the public interest, and ... shall be granted without modification or delay.”<sup>8</sup> In light of this statutory obligation, DOE/FE has found that it need not engage in any analysis of factors affecting the public interest. Because this request as it pertains to the FTA Authorization falls within section 3(c), it should be processed and approved in accordance with this standard.

#### **B. Non-FTA Authorization (Order No. 4364 *et al.*)**

With respect to this request as it pertains to the Non-FTA authorization, ECA Liquefaction submits that the public interest determination set forth in DOE/FE Order No. 4364 will not be affected by, and the public interest continues to be served by, this extension request. This request is not intended to otherwise modify the authorization granted to ECA Liquefaction in the Non-FTA Authorization other than the extension of the deadline specified in ordering paragraph (D) of Order No. 4364. ECA Liquefaction does not propose any changes to the nature, scope, or the design of the ECA Mid-Scale Project pursuant to this request. Neither will the overall volume of gas to be exported under the order be increased, given that ECA Liquefaction is not requesting at this time an extension of the ending date of the term of that order (*i.e.*, December 31, 2050). Therefore, the public interest analysis and environmental analysis in the Non-FTA Authorization

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<sup>8</sup> 15 U.S.C. §§ 717b(b)-(c).

continue to be applicable and no new analyses need to be completed. ECA Liquefaction submits there will be no change from DOE/FECM's original determination.

DOE/FECM limits any comments on a request for extension to the extension itself and not to the underlying authorization.<sup>9</sup> DOE/FECM should do so here.

### **C. Good Cause Exists to Grant this Extension Request**

Good cause exists to grant this request. In the time since issuance of the FTA and Non-FTA authorizations, ECA Liquefaction has proceeded expeditiously to advance the ECA Mid-Scale Project and has worked diligently to develop the project in a manner consistent with the DOE/FECM authorizations.

ECA Liquefaction has entered into delivery contracts with Mitsui & Co., Ltd. and Total Gas & Power Asia Private Limited. The ECA Mid-Scale Project reached FID in 2020.

ECA Liquefaction obtained all federal, state, local, and Mexican authorizations necessary for construction of the project facilities. Construction of the ECA Mid-Scale Project is 93.49% complete, with total project progress (including pre-commissioning and commissioning activities) reaching a cumulative 94.85%. As of the filing date of this request, ECA Liquefaction's main activities are now focused on pre-commissioning and commissioning activities and clearing punch list items in order to achieve (i) pretreatment mechanical completion, (ii) mechanical completion for interconnecting systems and common area, including BOG, and (iii) liquefaction mechanical completion.

ECA Liquefaction respectfully submits that, due to the time needed for the remaining construction of the ECA Mid-Scale Project, ECA Liquefaction should be granted an extension of

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<sup>9</sup> *Cameron LNG, LLC*, 85 Fed. Reg. 20993, 20994 (Apr. 15, 2020).

the existing commencement deadline to complete the construction and place the export facilities into service.

#### **IV. Conclusion**

ECA Liquefaction submits that this request is not inconsistent with the public interest and that good cause exists to grant this request. ECA Liquefaction respectfully requests that the FTA and Non-FTA authorizations be modified as set forth herein. ECA Liquefaction respectfully requests that DOE/FECM act on this request within a period not to exceed 90 (ninety) days after the date hereof, i.e., December 18, 2025.

Respectfully submitted,

/s/ Brett A. Snyder  
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*Counsel to ECA Liquefaction,  
S. de R.L. de C.V.*

Dated: September 19, 2025

## VERIFICATION

I, Carlo Orsenigo, declare that I am General Manager for ECA Liquefaction, S. de R.L. de C.V. and am duly authorized to make this Verification; that I have read the foregoing instrument and that the facts therein stated are true and correct to the best of my knowledge, information, and belief.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed in Houston, Texas on September 19, 2025.

/s/ Carlo Orsenigo

Carlo Orsenigo

General Manager

ECA Liquefaction, S. de R.L. de C.V.

1500 Post Oak Boulevard

Houston, TX 77056

September 19, 2025

Amy Sweeney  
Director, Office of Regulation, Analysis and Engagement (FE-34)  
Office of Resource Sustainability  
Office of Fossil Energy and Carbon Management  
1000 Independence Ave., S.W.  
Washington, DC 20585

**Re: ECA Liquefaction, S. de R.L. de C.V., FE Docket Nos. 18-144-LNG**  
**Request for Extension**

Dear Ms. Sweeney:

This opinion of counsel is submitted pursuant to Section 590.202(c) of the regulations of the United States Department of Energy (“DOE”), 10 C.F.R. § 590.202(c) (2023). I am counsel to ECA Liquefaction, S. de R.L. de C.V. (“ECA Liquefaction”).

I have reviewed the organizational and internal governance documents of ECA and it is my opinion that the Request for Extension filed by ECA Liquefaction with the DOE Office of Fossil Energy and Carbon Management on September 19, 2025, is within the company powers of ECA Liquefaction.

Respectfully submitted,

/s/ Jerrod L. Harrison

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*On Behalf of ECA Liquefaction, S. de R.L. de C.V.*



**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list in this proceeding.

Dated at New York, NY, this 19th day of September 2025.

/s/ Jane Thomas

Jane Thomas

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