

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

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GOLDEN PASS LNG TERMINAL LLC

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DOCKET NO. 25-81-LNG

ORDER GRANTING BLANKET AUTHORIZATION  
TO EXPORT LIQUEFIED NATURAL GAS PREVIOUSLY IMPORTED FROM  
FOREIGN SOURCES TO FREE TRADE AGREEMENT AND  
NON-FREE TRADE AGREEMENT NATIONS

DOE/FECM ORDER NO. 5340

SEPTEMBER 22, 2025

## **I. INTRODUCTION**

On June 26, 2025, Golden Pass LNG Terminal LLC (GPLNG) filed an Application<sup>1</sup> with the Department of Energy's (DOE) Office of Fossil Energy & Carbon Management (FECM) under section 3 of the Natural Gas Act (NGA).<sup>2</sup> GPLNG requests blanket authorization to export liquefied natural gas (LNG) previously imported into the United States by vessel from foreign sources in a volume equivalent to 50 billion cubic feet (Bcf) of natural gas on a cumulative basis for a two-year period commencing on October 1, 2025.<sup>3</sup> GPLNG seeks to export this LNG from the GPLNG Terminal in Sabine Pass, Texas.<sup>4</sup>

GPLNG seeks authorization to export the previously imported LNG to any country with the capacity to import LNG via ocean-going carrier and with which trade is not prohibited by U.S. law or policy.<sup>5</sup> This includes both countries with which the United States currently has, or in the future enters into, a free trade agreement (FTA) requiring national treatment for trade in natural gas (FTA countries),<sup>6</sup> and any other country with which trade is not prohibited by U.S. law or policy (non-FTA countries).<sup>7</sup> GPLNG states that it does not seek authorization to export any domestically produced natural gas or LNG.<sup>8</sup> GPLNG is requesting this authorization on its own

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<sup>1</sup> *Golden Pass LNG Terminal LLC*, Application for Blanket Authorization to Export Previously Imported Liquefied Natural Gas, Docket No. 25-81-LNG (June 26, 2025) [hereinafter App.].

<sup>2</sup> 15 U.S.C. § 717b. The authority to regulate the imports and exports of natural gas, including LNG, under section 3 of the NGA has been delegated to the Assistant Secretary for FECM in Redelegation Order No. S4-DEL-FE1-2023, issued on April 10, 2023.

<sup>3</sup> App. at 1. GPLNG expects that Train 1 of its export facility will be ready to begin start-up activities in October 2025.

<sup>4</sup> *See id.*

<sup>5</sup> *See id.* at 3.

<sup>6</sup> 15 U.S.C. § 717b(c). The United States currently has FTAs requiring national treatment for trade in natural gas with Australia, Bahrain, Canada, Chile, Colombia, Dominican Republic, El Salvador, Guatemala, Honduras, Jordan, Mexico, Morocco, Nicaragua, Oman, Panama, Peru, Republic of Korea, and Singapore. FTAs with Israel and Costa Rica do not require national treatment for trade in natural gas.

<sup>7</sup> *Id.* § 717b(a).

<sup>8</sup> App. at 3.

behalf and when acting as agent on behalf of other entities who may hold title to the LNG at the time of export.<sup>9</sup>

In this Order, DOE grants GPLNG's Application and authorizes the requested export of previously imported LNG in a volume equivalent to 50 Bcf of natural gas on a cumulative basis over the requested two-year period.

Specifically, DOE grants the FTA portion of the Application under NGA section 3(c).<sup>10</sup> Section 3(c) was amended by section 201 of the Energy Policy Act of 1992 (Pub. L. 102-486) to require that FTA applications "shall be deemed to be consistent with the public interest" and granted "without modification or delay."<sup>11</sup> The FTA portion of the Application falls within NGA section 3(c) and, therefore, DOE approves the requested FTA authorization without modification or delay. Accordingly, none of the public interest analysis discussed below applies to the FTA authorization.

DOE has reviewed the non-FTA portion of the Application under NGA section 3(a).<sup>12</sup> On July 21, 2025, DOE published a notice of the non-FTA portion of the Application in the *Federal Register* (Notice of Application).<sup>13</sup> The Notice of Application called on interested persons to submit protests, motions to intervene, notices of intervention, requests for additional procedures, and written comments by August 20, 2025. In response to the Notice of Application, DOE received two timely-filed comments: one anonymous comment opposing the Application,<sup>14</sup> and a second anonymous comment urging DOE to consider carbon dioxide emissions in its public

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<sup>9</sup> *Id.*

<sup>10</sup> 15 U.S.C. § 717b(c).

<sup>11</sup> *Id.*

<sup>12</sup> *Id.* § 717b(a).

<sup>13</sup> Golden Pass LNG Terminal LLC, Application for Blanket Authorization to Export Previously Imported Liquefied Natural Gas, 90 Fed. Reg. 34,260 (July 21, 2025).

<sup>14</sup> Comment of Anonymous, Docket No. 25-81-LNG (July 21, 2025) [hereinafter Anonymous Comment #1].

interest determination, as discussed below.<sup>15</sup> No protests or interventions were filed in response to the Application, and therefore the non-FTA portion of the Application is uncontested under DOE's regulations.<sup>16</sup>

DOE has reviewed the record for the non-FTA portion of this proceeding under NGA section 3(a) and grants the requested non-FTA authorization, as set forth below.

## **II. BACKGROUND**

**Applicant.** GPLNG states that it is a Delaware limited liability corporation with its principal place of business in Houston, Texas.<sup>17</sup> GPLNG states that it “is owned by QatarEnergy U.S. Investments (1) LLC, a Delaware limited liability company (an indirect subsidiary of QatarEnergy) and Golden Pass LNG Terminal Investments LLC, a Delaware limited liability Company (an indirect subsidiary of ExxonMobil Corporation).”<sup>18</sup>

**Procedural History.** GPLNG is authorized to export LNG by vessel from the GPLNG Terminal, which is currently under construction in Sabine Pass, Texas, under the following two orders:

- DOE/FE Order No. 3147, as amended (Docket No. 12-88-LNG),<sup>19</sup> authorizing exports in a volume equivalent to 937 billion cubic feet per year (Bcf/yr) of natural gas for a term extending through December 31, 2050, to any country with which the United States has entered into a free trade agreement (FTA) requiring national

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<sup>15</sup> Comment of Anonymous, Docket No. 25-81-LNG (Aug. 5, 2025) [hereinafter Anonymous Comment #2].

<sup>16</sup> See 10 C.F.R. § 590.102(b).

<sup>17</sup> App. at 2.

<sup>18</sup> *Id.*

<sup>19</sup> *Golden Pass LNG Terminal LLC*, DOE/FE Order No. 3147, Docket No. 12-88-LNG, Order Granting Long-Term Multi-Contract Authorization to Export Liquefied Natural Gas by Vessel from the Golden Pass LNG Terminal to Free Trade Agreement Nations (Sept. 27, 2017), *amended by* DOE/FE Order No. 3147-A (Mar. 4, 2020) (transferring authorization from Golden Pass Products LLC to Golden Pass LNG Terminal LLC), *further amended by* DOE/FE Order No. 3147-B (Mar. 24, 2020) (extending start of FTA term to Sept. 30, 2025); DOE/FE Order No. 3147-C (May 22, 2020) (amending Order No. 3147-B); DOE/FE Order No. 3147-D (Dec. 10, 2020) (extending export term); DOE/FE Order No. 3147-E (June 17, 2021) (increasing export volume); DOE/FECM Order No. 3147-F (Mar. 5, 2025) (modifying term to commence on date of first export). Before July 4, 2021, FECM was known as the Office of Fossil Energy (FE).

treatment for trade in natural gas (FTA countries), pursuant to NGA section 3(c),<sup>20</sup> and

- DOE/FE Order No. 3978, as amended (Docket No. 12-156-LNG),<sup>21</sup> authorizing exports in a volume equivalent to 937 Bcf/yr of natural gas for a term extending through December 31, 2050, to any other country with which trade is not prohibited by U.S. law or policy (non-FTA countries), pursuant to NGA section 3(a).<sup>22</sup>

These FTA and non-FTA export volumes are not additive to one another.<sup>23</sup>

Additionally, on February 12, 2024, DOE issued DOE/FECM Order No. 5095, authorizing GPLNG to import LNG from various international sources by vessel in a total volume equivalent to 50 Bcf of natural gas for a two year-term term commencing on March 30, 2024, and extending through March 29, 2026.<sup>24</sup> Under the terms of that authorization, GPLNG may import the LNG at any LNG receiving facility in the United States and its territories.<sup>25</sup>

### **III. DESCRIPTION OF REQUEST**

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<sup>20</sup> 15 U.S.C. § 717b(c). The United States currently has FTAs requiring national treatment for trade in natural gas with Australia, Bahrain, Canada, Chile, Colombia, Dominican Republic, El Salvador, Guatemala, Honduras, Jordan, Mexico, Morocco, Nicaragua, Oman, Panama, Peru, Republic of Korea, and Singapore. FTAs with Israel and Costa Rica do not require national treatment for trade in natural gas.

<sup>21</sup> *Golden Pass LNG Terminal LLC*, DOE/FE Order No. 3978, Docket No. 12-156-LNG, Opinion and Order Granting Long-Term, Multi-Contract Authorization to Export Liquefied Natural Gas by Vessel from the Golden Pass LNG Terminal Located in Jefferson County, Texas, to Non-Free Trade Agreement Nations (Apr. 25, 2017), *reh'g denied*, DOE/FE Order No. 3978-A (Mar. 30, 2018), *amended by* DOE/FE Order No. 3978-B (Mar. 4, 2020) (transferring authorization from Golden Pass Products LLC to Golden Pass LNG Terminal LLC), *further amended by* DOE/FE Order No. 3978-C (Mar. 24, 2020) (extending export commencement deadline to Sept. 30, 2025); DOE/FE Order No. 3978-D (Dec. 10, 2020) (extending export term); DOE/FECM Order No. 3978-E (Apr. 27, 2022) (increasing export volume); *reh'g denied*, DOE/FECM Order No. 3978-F (June 24, 2022); *further amended by* DOE/FECM Order No. 3978-G (Mar. 5, 2025) (extending export commencement deadline to Mar. 31, 2027); *see also Sierra Club v. U.S. Dep't of Energy*, 107 F.4th 1012 (D.C. Cir. 2024) (dismissing Sierra Club's petition for review of Order Nos. 3978-E and 3978-F for lack of standing).

<sup>22</sup> 15 U.S.C. § 717b(a).

<sup>23</sup> Effective January 12, 2021, long-term export authorizations contain authority to export the same approved volume of LNG pursuant to transactions with terms of less than two years, including commissioning volumes, on a non-additive basis. *See* U.S. Dep't of Energy, Including Short-Term Export Authority in Long-Term Authorizations for the Export of Natural Gas on a Non-Additive Basis; Policy Statement, 86 Fed. Reg. 2,243 (Jan. 12, 2021).

<sup>24</sup> *Golden Pass LNG Terminal LLC*, DOE/FECM Order No. 5095, Docket No. 24-1-LNG, Order Granting Blanket Authorization to Import Liquefied Natural Gas from Various International Sources by Vessel (February 12, 2024).

<sup>25</sup> *Id.*

GPLNG requests blanket authorization to export previously imported LNG in a volume equivalent to 50 Bcf of natural gas cumulatively over a two-year period beginning on October 1, 2025.<sup>26</sup> GPLNG seeks to export this LNG from the GPLNG Terminal to FTA and non-FTA countries, both on its own behalf and as an agent for other entities.<sup>27</sup> GPLNG states that it will comply with all DOE requirements for exporters and agents.<sup>28</sup> GPLNG further states that, when acting as agent, it will register with DOE each LNG title holder for whom it seeks to export LNG as agent, and will comply with other registration requirements.<sup>29</sup>

GPLNG states that the LNG proposed for export “would be derived from GPLNG’s LNG importing activities and [would] be residing in LNG storage tanks at the GPLNG terminal.”<sup>30</sup> GPLNG further states that the LNG would “either be re-exported or regasified to be used as fuel gas at the facility,” and that GPLNG “plans to use the imported LNG as part of the start-up of its export facility.”<sup>31</sup> GPLNG adds that no physical modifications to the GPLNG Terminal will be required to accommodate the requested authorization.<sup>32</sup>

#### **IV. APPLICANT’S PUBLIC INTEREST ANALYSIS FOR NON-FTA AUTHORIZATION**

GPLNG maintains that its requested authorization is consistent with NGA section 3(a) and DOE’s policy. GPLNG asserts that the volume of previously imported foreign-sourced LNG that it proposes to export is not necessary to meet domestic needs. In support of this argument, GPLNG points to DOE’s *Response to Comments for the 2024 LNG Export Study: Energy, Economic, and Environmental Assessment of U.S. LNG Exports*, where DOE “found that U.S.

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<sup>26</sup> App. at 1.

<sup>27</sup> *Id.* at 1,3.

<sup>28</sup> *Id.* at 6.

<sup>29</sup> *Id.*

<sup>30</sup> *Id.* at 3.

<sup>31</sup> *See id.*

<sup>32</sup> *See App.* at 4.

domestic natural gas supply is sufficient to meet domestic and market-based global demand for U.S. natural gas (including LNG).”<sup>33</sup> GPLNG further contends that the LNG to be re-exported after import “will not have an adverse impact on the domestic supplies or prices,” and that “foreign sourced natural gas [is not] needed to meet domestic demands.”<sup>34</sup>

GPLNG also refers to additional guidance, both recent and long-standing, for DOE’s public interest determination. First, noting that NGA section 3 “creates a statutory presumption in favor of approval . . . which opponents bear the burden of overcoming,” GPLNG states that DOE “applies the principles described in DOE Delegation Order No. 0204-111, which focuses primarily on domestic need for the gas to be exported, and DOE’s 1984 Policy Guidelines.”<sup>35</sup> GPLNG then cites Executive Order No. 14,154 of January 20, 2025, for its statement that U.S. energy policy includes “protect[ing] the United States’s economic and national security and military preparedness by ensuring that an abundant supply of reliable energy is readily accessible in every state and territory of the Nation.”<sup>36</sup>

GPLNG next contends that granting its requested authorization “would facilitate GPLNG’s start up of its export terminal and avail itself of spot-market LNG import cargoes.”<sup>37</sup> GPLNG claims that, “depending on domestic and global market price signals, the LNG could be regasified to be consumed in the domestic natural gas market, which in turn would help to further promote the liquidity of supply available to the U.S. market and would thereby serve to moderate U.S. gas

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<sup>33</sup> *Id.* at 5 (citing U.S. Dep’t of Energy, Office of Fossil Energy & Carbon Management, *Energy, Economic, and Environmental Assessment of U.S. LNG Exports: Response to Comments*, at 50 (May 19, 2025), [https://www.energy.gov/sites/default/files/2025-05/2024%20LNG%20Export%20Study\\_Response%20to%20Comments\\_Final\\_05.19.2025.pdf](https://www.energy.gov/sites/default/files/2025-05/2024%20LNG%20Export%20Study_Response%20to%20Comments_Final_05.19.2025.pdf)).

<sup>34</sup> *Id.*

<sup>35</sup> *Id.* at 4.

<sup>36</sup> *See id.* at 4-5.

<sup>37</sup> *Id.* at 6.

price volatility.”<sup>38</sup> According to GPLNG, “the requested export authorization is [therefore] consistent with the public interest.”<sup>39</sup>

## **V. DISCUSSION AND CONCLUSIONS FOR NON-FTA AUTHORIZATION**

### **A. Procedural Matters**

DOE received two timely-filed comments in response to the Notice of Application, as set forth above.<sup>40</sup> The first Anonymous Comment states that “under no circumstance should a permit be issued for importation or exportation of fossil fuels” due to climatological effects of fossil fuel production and consumption, and specifically the increasing frequency, intensity, and expense of natural disasters.<sup>41</sup> The Comment contends that “[w]e can’t afford not to liquidate the fossil fuel industry and transition faster to clean renewable sources of energy.”<sup>42</sup>

The second Anonymous Comment asks that DOE “fully consider the carbon dioxide implications and related climate externalities of this proposed authorization, even though it applies to previously imported LNG.”<sup>43</sup> Arguing that U.S. export decisions have a global impact, the Comment contends that DOE should “evaluat[e] the [carbon dioxide] implications of expanding or facilitating fossil fuel infrastructure use” in its public interest determination, adding that “DOE must weigh economic benefits against climate costs in a transparent manner.”<sup>44</sup>

### **B. Standard of Review**

Section 3(a) of the NGA sets forth the applicable standard for DOE’s review of GPLNG’s requested non-FTA authorization. Section 3(a) provides:

[N]o person shall export any natural gas from the United States to a foreign country or import any natural gas from a foreign country

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<sup>38</sup> App. at 6-7.

<sup>39</sup> *Id.* at 7.

<sup>40</sup> *See supra* at 3-4.

<sup>41</sup> *See* Anonymous Comment #1.

<sup>42</sup> *Id.*

<sup>43</sup> Anonymous Comment #2 at 1.

<sup>44</sup> *See id.* at 2.



without first having secured an order of the [Secretary of Energy] authorizing it to do so. The [Secretary] shall issue such order upon application, unless after opportunity for hearing, [the Secretary] finds that the proposed exportation or importation will not be consistent with the public interest. The [Secretary] may by [the Secretary's] order grant such application, in whole or part, with such modification and upon such terms and conditions as the [Secretary] may find necessary or appropriate.<sup>45</sup>

This provision creates a rebuttable presumption that a proposed export of natural gas is in the public interest.<sup>46</sup> DOE must grant such an application unless the presumption is overcome by an affirmative showing of inconsistency with the public interest.<sup>47</sup>

In evaluating an export application under this standard, DOE applies the principles described in DOE's 1984 Policy Guidelines<sup>48</sup> and other matters determined to be appropriate to a determination of the public interest, such as the domestic need for the natural gas to be exported. Before issuing a final decision, DOE must also comply with the National Environmental Policy Act of 1969 (NEPA).<sup>49</sup>

### **C. Domestic Need**

GPLNG requests authorization to export LNG that was previously imported into the United States from foreign sources. Exporting this proposed volume of LNG will not reduce the availability of domestically produced natural gas. On the other hand, exporting previously imported LNG could affect the domestic natural gas market because, for the requested two-year period, the proposed exports will reduce the volume of natural gas potentially available for consumption within the United States.

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<sup>45</sup> 15 U.S.C. § 717b(a).

<sup>46</sup> *See, e.g., Sierra Club v. U.S. Dep't of Energy*, 867 F.3d 189, 203 (D.C. Cir. 2017) (citations omitted).

<sup>47</sup> *See id.* (citations omitted).

<sup>48</sup> U.S. Dep't of Energy, New Policy Guidelines and Delegation Orders from Secretary of Energy to Economic Regulatory Administration and Federal Energy Regulatory Commission Relating to Regulation of Imported Natural Gas, 49 Fed. Reg. 6684, 6690 (Feb. 22, 1984).

<sup>49</sup> 42 U.S.C. § 4321 *et seq.*

DOE has issued numerous blanket authorizations to export previously imported LNG in other proceedings.<sup>50</sup> These orders were based, in part, on authoritative data indicating that United States consumers have access to substantial quantities of natural gas sufficient to meet domestic demand from other competitively-priced sources. For this proceeding, DOE takes administrative notice of the most recent analysis prepared by EIA in AEO 2025.<sup>51</sup> AEO 2025 projects annual domestic dry natural gas production in 2026 and 2027 of 38.94 trillion cubic feet (Tcf) and 39.09 Tcf, respectively, with total natural gas consumption projected to be 32.13 Tcf and 32.54 Tcf in each respective year.<sup>52</sup>

Because domestic natural gas production levels are projected to reach an amount that well exceeds the amount of natural gas proposed for short-term export in GPLNG's Application, we find that United States consumers will continue to have access to substantial quantities of natural gas sufficient to meet domestic demand from multiple other sources at competitive prices without drawing on the LNG that GPLNG seeks to export.

#### **D. Other Public Interest Factors**

Consistent with DOE's Policy Guidelines and DOE precedent, DOE considers the potential effects of the proposed exports on other aspects of the public interest. In this proceeding, those considerations include the anonymous comments submitted in response to the Notice of Application.

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<sup>50</sup> DOE maintains a list of its authorizations at <https://www.energy.gov/fecm/articles/electronic-docket-room-e-docket-room>.

<sup>51</sup> See U.S. Energy Info. Admin., *Annual Energy Outlook 2025 Narrative* (Apr. 15, 2025), <https://www.eia.gov/outlooks/aeo/pdf/2025/AEO2025-narrative.pdf>.

<sup>52</sup> See AEO 2025 Reference Case, Table 13: Natural Gas Supply, Disposition, and Prices, <https://www.eia.gov/outlooks/aeo/data/browser/#/?id=13-AEO2025&cases=ref2025&sourcekey=0>.

As noted above, Anonymous Comment #1 generally opposes the Application, along with international trade in natural gas. Anonymous Comment #2 urges DOE to consider carbon dioxide implications and climate externalities in its adjudication of applications.

Neither comment is persuasive in the instant matter. First, DOE cannot eliminate international trade in natural gas to and from the United States. As discussed above, natural gas exports are presumed to be consistent with the public interest, and opponents bear the burden of overcoming this presumption. Even if DOE were to find that all non-FTA exports were inconsistent with the public interest—which, again, would require opponents to overcome the presumption of consistency with the public interest—the NGA obligates DOE to authorize FTA imports and exports. Anonymous Comment #1’s objective of eliminating international trade of natural gas would therefore require an act of Congress, a judicial finding, or both, and is beyond the scope of executive authority. Second, as for the climate concerns identified in both comments, including Anonymous Comment #2 urging DOE to consider carbon dioxide emissions in its adjudication of applications, DOE finds that these arguments are beyond the scope of DOE’s review in this order. DOE has found that its environmental review in non-FTA export proceedings is limited to the “potential effects associated with marine transport of LNG” and these effects are found to be minimal.<sup>53</sup>

Upon review, DOE finds that the record evidence showing that GPLNG’s requested authorization will be in the public interest under NGA section 3(a) outweighs the generalized concerns raised by both anonymous comments. Additionally, as noted below, DOE is complying with NEPA in issuing this authorization.

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<sup>53</sup> *Venture Global Calcasieu Pass, LLC*, DOE/FECM Order No. 4346-B, Docket No. 15-25-LNG, Order Amending Long-Term Authorization to Export Liquefied Natural Gas to Non-Free Trade Agreement Nations (Aug. 4, 2025) (citing National Environmental Policy Act Implementing Procedures; Final Rule, 85 Fed. Reg. at 78,197 (Dec. 4, 2020)).

### **E. Issuance of Categorical Exclusion Under NEPA**

DOE's NEPA procedures provide for a categorical exclusion if neither an environmental assessment (EA) nor an environmental impact statement (EIS) is required—specifically, categorical exclusion B5.7, *Export of natural gas and associated transportation by marine vessel*.<sup>54</sup> On September 19, 2025, DOE issued a categorical exclusion for the non-FTA portion of GPLNG's Application under this provision.<sup>55</sup>

### **F. Conclusion**

Upon review of the record, DOE finds that a grant of the uncontested non-FTA portion of GPLNG's Application is not inconsistent with the public interest. In particular, the record shows that there is a sufficient supply of natural gas to satisfy domestic demand from multiple other sources at competitive prices without drawing on GPLNG's proposed exports of previously imported LNG during the two-year authorization period. Further, the proposed exports of previously imported LNG qualify for a categorical exclusion under NEPA, such that no EA or EIS will be required. DOE therefore grants the non-FTA portion of GPLNG's Application, as set forth below.

## **VI. FINDINGS**

(1) Section 3(c) of the NGA was amended by section 201 of the Energy Policy Act of 1992 (Pub. L. 102-486) to require that applications requesting authority for the export of natural gas, including LNG, to a nation with which there is in effect an FTA requiring national treatment for trade in natural gas shall be deemed consistent with the public interest and granted without modification or delay.<sup>56</sup> The FTA portion of GPLNG's Application falls within section 3(c), as

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<sup>54</sup> See 10 C.F.R. Part 1021, Subpt. D, App. B, Categorical Exclusion B5.7.

<sup>55</sup> U.S. Dep't of Energy, Categorical Exclusion Determination, Golden Pass LNG Terminal LLC, Docket No. 25-81-LNG (Sept. 19, 2025).

<sup>56</sup> 15 U.S.C. § 717b(c).

amended, and therefore, DOE grants the requested authorization without modification or delay.<sup>57</sup>

(2) With respect to the non-FTA portion of the Application, and after due consideration based on all facts and evidence of record, DOE finds that a grant of the Application is not inconsistent with the public interest under NGA section 3(a).

(3) GPLNG requests authorization to export LNG on its own behalf and as agent for other entities that hold title to the LNG at the time of export. DOE previously addressed the issue of Agency Rights in DOE/FE Order No. 2913,<sup>58</sup> which granted Freeport LNG Expansion, L.P. *et al.* (collectively, FLEX) authority to export LNG to FTA countries. In that order, DOE approved a proposal by FLEX to register each LNG title holder for whom FLEX sought to export LNG as agent. DOE found that this proposal was an acceptable alternative to the non-binding policy adopted by DOE in *The Dow Chemical Company*, which established that the title for all LNG authorized for export must be held by the authorization holder at the point of export.<sup>59</sup> We find that the same policy considerations that supported DOE's acceptance of the alternative registration proposal in DOE/FE Order No. 2913 apply here as well.

DOE reiterated its policy on Agency Rights procedures in other authorizations, including *Cameron LNG, LLC*, DOE/FE Order No. 3680.<sup>60</sup> In that order, DOE determined that, in LNG export orders in which Agency Rights have been granted, DOE shall require registration materials filed for, or by, an LNG title-holder (Registrant) to include the same company identification

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<sup>57</sup> DOE further finds that the requirement for public notice of applications and other hearing-type procedures in 10 C.F.R. Part 590 are applicable only to applications seeking to export natural gas, including LNG, to non-FTA countries.

<sup>58</sup> *Freeport LNG Expansion, L.P., et al.*, DOE/FE Order No 2913, Docket No. 10-160-LNG, Order Granting Long-Term Authorization to Export Liquefied Natural Gas from Freeport LNG Terminal to Free Trade Nations (Feb. 10, 2011).

<sup>59</sup> *The Dow Chemical Co.*, DOE/FE Order No. 2859, Docket No. 10-57-LNG, Order Granting Blanket Authorization to Export Liquefied Natural Gas, at 7-8 (Oct. 5, 2010), discussed in *Freeport LNG*, DOE/FE Order No. 2913, at 7-8.

<sup>60</sup> *Cameron LNG, LLC*, DOE/FE Order No. 3680, Docket No. 15-36-LNG, Order Granting Long-Term, Multi-Contract Authorization to Export Liquefied Natural Gas by Vessel from the Cameron LNG Terminal in Cameron and Calcasieu Parishes, Louisiana, to Free Trade Agreement Nations (July 10, 2015).

information and long-term contract information of the Registrant as if the Registrant had filed an application to export LNG on its own behalf.<sup>61</sup>

To ensure that the public interest is served, this authorization requires that, where GPLNG proposes to export LNG as agent for other entities who hold title to the LNG, GPLNG must register the Registrants with DOE in accordance with the procedures and requirements described herein.

### **ORDER**

Pursuant to section 3 of the NGA, it is ordered that:

A. Golden Pass LNG Terminal LLC (GPLNG) is authorized to export LNG previously imported from foreign sources in a volume equivalent to 50 Bcf of natural gas, pursuant to transactions that have terms of not greater than two years. GPLNG is authorized to export this LNG on its own behalf or as agent for other entities that hold title to the LNG at the time of export. This authorization shall be effective for a two-year term beginning on October 1, 2025, and extending through September 30, 2027.

B. This LNG may be exported by vessel from the GPLNG Terminal in Sabine Pass, Texas, to any country with the capacity to import LNG via ocean-going LNG carriers and with which trade is not prohibited by U.S. law or policy.

C. GPLNG shall ensure that all transactions authorized by this Order are permitted and lawful under U.S. laws and policies, including the rules, regulations, orders, policies, and other determinations of the Office of Foreign Assets Control of the United States Department of the Treasury. Failure to comply with this requirement could result in rescission of this authorization and/or other civil or criminal penalties.

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<sup>61</sup> See *id.* at 8-9.

D. GPLNG, or others for whom GPLNG acts as agent, shall include the following provision in any agreement or contract for the sale or transfer of LNG exported pursuant to this Order:

Customer or purchaser acknowledges and agrees that it will resell or transfer LNG purchased hereunder for delivery only to countries identified in Ordering Paragraph B of DOE/FECM Order No. 5340, issued September 22, 2025, in Docket No. 25-81-LNG, and/or to purchasers that have agreed in writing to limit their direct or indirect resale or transfer of such LNG to such countries. Customer or purchaser further commits to cause a report to be provided to Golden Pass LNG Terminal LLC that identifies the country (or countries) into which the LNG was actually delivered, and to include in any resale contract for such LNG the necessary conditions to ensure that Golden Pass LNG Terminal LLC is made aware of all such countries.

E. GPLNG is permitted to use its authorization in order to export previously imported LNG as agent for other entities, after registering the other entities with DOE. Registration materials shall include an acknowledgement and agreement by the Registrant to supply GPLNG with all information and copies of contracts necessary in order to permit GPLNG to register that person or entity with DOE, including: (1) the Registrant's agreement to comply with this Order and all applicable requirements of DOE's regulations at 10 C.F.R. Part 590, including but not limited to destination restrictions; (2) the exact legal name of the Registrant, state/location of incorporation/registration, primary place of doing business, and the Registrant's ownership structure, including the ultimate parent entity if the Registrant is a subsidiary or affiliate of another entity; (3) the name, title, mailing address, e-mail address, and telephone number of a corporate officer or employee of the Registrant to whom inquiries may be directed; and (4) an acknowledgement and agreement by the Registrant to include the provision in Ordering Paragraph D in any contract for the sale or transfer of LNG exported pursuant to this Order.

F. Each registration submitted pursuant to this Order shall have current information on file with DOE. Any changes in company name, contact information, or other relevant modifications shall be filed with DOE within 30 days of such change(s).

G. GPLNG shall ensure that all persons required by this Order to register with DOE have done so.

H. Monthly Reports: With respect to the exports authorized by this Order, GPLNG shall file with the U.S. Department of Energy, Office of Fossil Energy and Carbon Management, Office of Resource Sustainability, Office of Regulation, Analysis, and Engagement (FE-34), within 30 days following the last day of each calendar month, a report on Form FE-746R indicating whether exports of LNG have been made. Monthly reports must be filed whether or not initial deliveries have begun. If no exports have occurred, a report of “no activity” for that month must be filed. If exports have occurred, the report must provide the information specified for each applicable activity and mode of transportation, as set forth in the Guidelines for Filing Monthly Reports. These Guidelines are available at <https://www.energy.gov/fecm/guidelines-filing-monthly-reports>. (Approved by the Office of Management and Budget under OMB Control No. 1901-0294)

I. The first monthly report required by this Order is due not later than November 30, 2025, and should cover the reporting period from October 1, 2025, through October 31, 2025.

J. All monthly report filings on Form FE-746R shall be made to the Office of Regulation, Analysis, and Engagement according to the methods of submission listed on the Form FE-746R reporting instructions available at <https://www.energy.gov/fecm/regulation>.

Issued in Washington, D.C., on September 22, 2025.

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Amy Sweeney  
Director, Office of Regulation, Analysis, and Engagement  
Office of Resource Sustainability