



700 Louisiana Street,
Suite 2410
Houston, Texas 77002
www.mexicopacific.com

RECEIVED

By Docket Room at 3:47 pm, Sep 30, 2025

September 30, 2025

Ms. Larine A. Moore
Docket Room Manager, Office of Fossil Energy and Carbon Management (FE-34), Office of Regulation, Analysis, and Engagement
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585

Filed electronically via FERGAS@HQ.DOE.GOV

**Re: Mexico Pacific Limited LLC
FE Docket Nos. 18-70-LNG and 22-167-LNG
October 2025 Semi-Annual Report**

Dear Ms. Moore:

Pursuant to Ordering Paragraph J of DOE FE Order No. 4248,¹ Ordering Paragraph N of DOE/FE Order No. 4312,² and Ordering Paragraph J of DOE FECM Order No. 4995,³ I submit to the Department of Energy's ("DOE") Office of Fossil Energy and Carbon Management ("DOE/FECM") on behalf of Mexico Pacific Limited LLC ("MXP") this semi-annual report describing the progress MXP has made in the development and commercialization of its proposed LNG production and storage facility to be located in the State of Sonora, Mexico (the "Saguaro Energía LNG Facility"). MXP has made progress in advancing the project since MXP filed its April 2025 Semi-Annual Report, as detailed herein.

As in the past, and following the election of Claudia Sheinbaum, MXP continues to work collaboratively with the government of Mexico. President Sheinbaum's administration has expressed continued support for the project as furthering its commitment to the well-being of the country and its people, along with the development of cleaner energy sources. This aligns with MXP's vision for responsible energy infrastructure. The Saguaro Energía LNG Facility in Sonora forms a foundational pillar of the Sonora Plan.⁴

The Saguaro Energía LNG Facility is equally recognized as critically important to the U.S., providing a vital solution for U.S. Permian Basin natural gas producers – including project customers ExxonMobil and ConocoPhillips – to produce and evacuate over 1,000 Bcf/yr (nearly 3 Bcf/d) of associated natural gas to Asian gas markets in a manner that achieves the lowest landed price of LNG into Asia globally. MXP's strong price advantage further strengthens the objective of ensuring U.S. energy dominance across strategic global markets. The project is aligned with President Trump's desire to "unleash US LNG" and provides an alternative westward direction to evacuate Permian natural gas to the U.S.'s allies and customers in the global LNG market.

Collectively, MXP and its affiliates have entered into long-term LNG offtake contracts providing for the sale of approximately 13 mtpa of LNG that will be produced by the Saguaro Energía LNG Facility to seven credit-worthy global LNG industry players, including large U.S. producers ExxonMobil and ConocoPhillips. These agreements remain valid and in good standing, and evidence strong market demand for the LNG to be supplied from the Saguaro Energía LNG Facility.

1 Mexico Pacific Limited LLC, DOE/FE Order No. 4248 (Sept. 19, 2018).

2 Mexico Pacific Limited LLC, DOE/FE Order No. 4312 (Dec. 14, 2018).

3 Mexico Pacific Limited LLC, DOE/FECM Order No. 4995 (Apr. 28, 2023).

4 As detailed in MXP's October 2023 Semi-Annual Report, the Sonora Plan is a trilateral clean energy infrastructure and nearshoring initiative announced by the Mexican, U.S. and Canadian governments in 2023. The Sonora Plan seeks to promote clean energy development, investment, and economic prosperity for the benefit of Sonora and Mexico.

Ms. Larine A. Moore
September 30, 2025
Page 2

As MXP has stated in prior filings submitted to DOE/FECM, MXP anticipates that it will receive U.S.-sourced natural gas for liquefaction in the Saguaro Energía LNG Facility through existing or newbuild gas transmission pipeline systems.⁵ The U.S. portion of one such newbuild pipeline system is expected to be developed and constructed by Saguaro Connector Pipeline, L.L.C. ("Saguaro Connector"). The route of the Saguaro Connector pipeline will originate in the vicinity of the Waha Hub in west Texas and will terminate at a border crossing pipeline facility to be constructed at the international Boundary between the U.S. and Mexico in the Río Grande River in Hudspeth County, Texas. The Federal Energy Regulatory Commission (the "Commission") granted Saguaro Connector a Presidential Permit and authorization pursuant to section 3 of the Natural Gas Act ("NGA"), Part 153 of the Commission's regulations, and Executive Order Nos. 10485 and 12038 to site, construct, and operate a natural gas pipeline and related facilities for the export of natural gas at the international Boundary. *Saguaro Connector Pipeline, LLC*, 186 FERC 161,114 (Feb. 15, 2024). On July 10, 2024, the Commission issued an order addressing arguments raised on rehearing, and the Commission upheld the grant to Saguaro Connector of a Presidential Permit and authorization pursuant to section 3 of the NGA. *See Saguaro Connector Pipeline, LLC*, 188 FERC ¶ 61,029 (2024). The Sierra Club's and Public Citizen's petition for review of the Commission's orders authorizing the Saguaro Connector border crossing facility filed with the U.S. Court of Appeals for the District of Columbia Circuit in *Sierra Club, et al v. FERC*, D.C. Cir. No. 24-1199 was denied in a unanimous opinion issued August 1, 2025.⁶

On June 18, 2025, MXP filed with DOE/FECM an application for an extension of the date for commencement of first exports established by the non-FTA export authorization issued in FE Docket No 18-70-LNG. That application remains pending. MXP looks forward to receiving an order granting this extension request.

MXP gave notice to DOE/FECM on March 5, 2025 (as supplemented on March 21, 2025 and August 8, 2025) of a change in control (CIC) of MXP which was effectuated by means of a transaction dated July 9, 2025. The change in control of MXP resulting from the described transaction was designed to strengthen the LNG export project.

MXP continues actively to pursue the development of the Saguaro Energía LNG Facility and anticipates making additional progress in the coming months.

If you have any questions regarding this submission, please contact me.

Sincerely,

Manuela Molina
CEO
Mexico Pacific Limited LLC

⁵ *See, e.g.*, Supplement to Application of Mexico Pacific Limited LLC for Additional Long-Term, Multi-Contract Authorization to Export Natural Gas to Mexico and to Re-export Liquefied Natural Gas to Free Trade Agreement and Non- Free Trade Agreement Nations- Supplemental Information on Available Pipeline Transportation Alternatives, Docket No. 22-267-LNG (Jan. 24, 2023).

⁶ *Sierra Club and Public Citizen v. FERC*, D.C. Cir. No. 24-1999 (Aug. 1, 2025), available at 24-1199-2128320.pdf (rejecting all challenges which Sierra Club, et al. brought against the Commission's authorization of the Saguaro Connector natural gas pipeline border crossing facility).