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November 24, 2025

VIA ELECTRONIC FILING
(FERGAS@HQ.DOE.GOV)

U.S. Department of Energy
Office of Fossil Energy and Carbon Management
FE-34 - ROOM 3E-056
1000 Independence Avenue, S.W.
Washington DC 20585
Attention: Amy Sweeney
Director, Division of Natural Gas Regulation
Office of Regulation, Analysis, and Engagement

**Re: Response to Request for Further Updates in Change in Control Proceeding and Fourth Supplement to March 5, 2025 CIC Notice
Mexico Pacific Limited LLC, Docket Nos. 18-70-LNG and 22-167-LNG**

Dear Ms. Sweeney:

I am writing to respond on behalf of Mexico Pacific Limited LLC ("MXP") to your letter dated November 12, 2025 requesting further updates in the captioned proceedings. In this letter I also provide a further supplement to MXP's March 5, 2025 CIC Notice documenting the assignment of a minority interest in MXP Holdings to an Ontario limited partnership.

In the November 12, 2025 letter, you informed MXP that DOE requires additional information concerning MXP's request for confidential treatment of the names of certain owners of minority economic interests in MXP's parent company, MXP Holdings, LLC ("MXP Holdings") if MXP intends to stand by that request. DOE informed MXP that it must either withdraw its request for confidential treatment of the names of the minority investors in MXP Holdings, or provide specific facts upon which DOE can rely to determine whether that information should be exempted from public disclosure.

MXP has decided to withdraw its request for confidential treatment of the names of the three entities that are now minority investors in MXP Holdings; these entities are identified below. This information is included in the copies of this letter it is serving on parties to the captioned proceedings, and will be available in DOE's public files. MXP, however, maintains its request that DOE make publicly available only the redacted version of the letter which MXP filed in the captioned proceedings on November 4, 2025, to protect the legitimate privacy interests of an individual named therein.

In its "Third Supplement to the March 5, 2025 CIC Notice," MXP informed DOE that four entities held membership interests in MXP Holdings. Those entities were identified as: (i) Windsor Cliff Sponsor, the majority member, holding seventy percent (70%) of the economic interest in MXP Holdings, and (ii) three minority investors, each holding a ten percent (10%) economic interest in MXP Holdings. MXP requested that the identities of these three minority investors be treated as confidential

MXP hereby further supplements its March 5, 2025 CIC Notice to inform DOE that since its submission of its "Third Supplement to the March 5, 2025 CIC Notice," one of the three owners of a ten percent (10%) economic interest in MXP Holdings has assigned that minority interest to an Ontario limited partnership.

Following the completion of the assignment of a ten percent (10%) economic interest in MXP Holdings, the three minority investors in MXP Holdings, each holding a ten percent (10%) economic interest, are:

- LDM Strategic Holdings, LLC, a Florida limited liability company;
- Avila Blue, LLC, a Florida limited liability company; and
- Sonvapor LP, an Ontario limited partnership.

There are no corporate or other affiliations among these entities beyond their ownership of their minority interests in MXP Holdings.

With the information provided above and in its March 5, 2025 CIC Notice, as supplemented, MXP has complied with the requirement that it identify "all the participants in the transaction, including the parent company, if any, and [has identified] any corporate or other affiliations among the participants." 10 C.F.R. § 590.202(b)(3); *see also* U.S. Dep't of Energy, Procedures for Changes in Control Affecting Applications and Authorizations to Import or Export Natural Gas, 79 Fed. Reg. 65,541 (Nov. 5, 2014) at 65,542. MXP submits that in its CIC Notice, as supplemented, it has provided information as to ownership, control and governance of MXP and its parent company that should enable DOE to find that the described change in control would not render MXP's existing non-FTA authorization, or the supplemental non-FTA authorization MXP has requested in Docket No. 22-167-LNG, inconsistent with the public interest under Section 3(a) of the Natural Gas Act.

MXP therefore requests that DOE accept and give effect to MXP's notification of change in control, and that it confirm that it has taken this action as promptly as possible.

Amy Sweeney
Director, Division of Natural Gas Regulation
November 24, 2025
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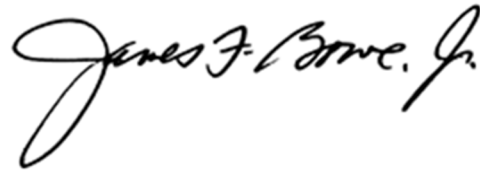
Procedural Matters

I include with this supplemental submission a Verification and Certificate of Service. We are serving this submission and this supplement on all parties on the service list in the captioned proceedings.

If you have any questions regarding this response, please contact me at (202) 626-9601 or by email at jbowe@kslaw.com. Thank you for your assistance.

Very truly yours,

King & Spalding LLP

A handwritten signature in black ink, reading "James F. Bowe, Jr." in a cursive script.

James F. Bowe, Jr.

Attorney for Mexico Pacific Limited LLC

JFB

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

Mexico Pacific Limited LLC

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**Docket Nos. 18-70-LNG
and 22-167-LNG**

VERIFICATION

Pursuant to 28 U.S.C. § 1746, I, James F. Bowe, Jr., hereby verify under penalty of perjury that I am authorized to execute this verification, that I have read the Response to Request for Information in Change of Control Proceeding of Mexico Pacific Limited LLC dated November 24, 2025, and that the facts stated therein are true and correct to the best of my knowledge.

Electronically signed at Washington, DC, on November 24, 2025.

/s/ James F. Bowe, Jr.

James F. Bowe, Jr.

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

Mexico Pacific Limited LLC

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**Docket Nos. 18-70-LNG
and 22-167-LNG**

CERTIFICATE OF SERVICE

Pursuant to 10 C.F.R. § 590.107, I, Tyler R. Brown, hereby certify that I caused the foregoing documents to be served on the persons included on the official service list for the captioned proceedings, as provided by DOE/FECM, on November 24, 2025.

/s/Tyler R. Brown
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