

VIA CERTIFIED MAIL AND VIA EMAIL TO fergas@hq.doe.gov

November 13, 2025

Ms. Amy Sweeney
U.S. Department of Energy
Natural Gas Regulation
FE-34 - Room 3E-056
1000 Independence Ave., SW
Washington, DC 20585

RE: Application of Texas Pipeline Exports, LLC for Long-Term Authorization to Export Natural Gas to Mexico (Public Version); Docket No. 25-____-NG

Dear Ms. Sweeney:

Pursuant to Section 3 of the Natural Gas Act, 15 U.S.C. § 717b, and Part 590 of the regulations of the Department of Energy (“DOE”), 10 C.F.R. Part 590, Texas Pipeline Exports, LLC (“Applicant”) hereby submits the enclosed Application for Long-Term Authorization to Export Natural Gas to Mexico (“Application”), including all appendices. Applicant is submitting this Application both electronically and in hardcopy. The hardcopy submission will include the Application and its appendices – including copies of confidential, un-redacted versions of the transportation service agreements (“TSAs”) pursuant to which Applicant’s natural gas volumes will be exported to Mexico submitted under seal – and a copy of receipt for the required payment of \$50.00.

Appendix C to the Application contains copies of the TSAs. The public version of Appendix C provides brief summaries of the TSAs. However, due to the sensitive commercial information contained within the TSAs, Applicant is submitting the TSAs on a confidential basis, under seal, pursuant to 10 C.F.R. §§ 590.202(e) and 1004.11. The TSAs contain commercially sensitive information, including terms and pricing resulting from arm’s length negotiations, and are therefore not publicly available. The TSAs should be afforded confidential treatment and exempted from public disclosure because they (1) have been held in confidence by the counterparties thereto, (2) are of a type customarily held in confidence, (3) are being transmitted to DOE in confidence, (4) are not publicly available, and (5) if disclosed, may cause substantial harm to the competitive positions of the parties to the TSAs, including potentially impeding future negotiations for similar transactions. *See* 10 C.F.R. § 1004.11(f).

Please do not hesitate to contact the undersigned with any questions you may have regarding this submittal.

Respectfully submitted,

/s/ Andrew Kriha

Andrew Kriha

Paul Forshay

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Attorneys for Texas Pipeline Exports, LLC

Enclosures

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

Texas Pipeline Exports, LLC

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Docket No. 25-__-NG

**APPLICATION OF TEXAS PIPELINE EXPORTS, LLC FOR
LONG-TERM AUTHORIZATION TO EXPORT NATURAL
GAS TO MEXICO FROM THE UNITED STATES**

Communications regarding this application should be directed to:

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

Texas Pipeline Exports, LLC

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Docket No. 25 - __ - NG

**APPLICATION OF TEXAS PIPELINE EXPORTS, LLC FOR
LONG-TERM AUTHORIZATION TO EXPORT
NATURAL GAS TO MEXICO FROM THE UNITED STATES**

Pursuant to Section 3 of the Natural Gas Act (“NGA”)¹ and Part 590 of the Department of Energy (“DOE”) Regulations,² Texas Pipeline Exports, LLC (“Applicant”) hereby submits this application (“Application”) to DOE’s Office of Fossil Energy and Carbon Management (“DOE/FECM”) for long-term authorization to export up to 18.9627 billion cubic feet (“Bcf”) per year of natural gas by pipeline to Mexico. Applicant requests this authorization for a term commencing on the date this Application is approved by DOE/FECM and extending until December 31, 2030, on its own behalf.

This Application concerns exports of natural gas via pipeline to Mexico, a nation with which the United States has entered into a free trade agreement (“FTA”) requiring national treatment for trade in natural gas. Section 3(c) of the NGA provides that such exports are “deemed to be within the public interest,” and that applications for such exports must be granted “without modification or delay.”³ Applicant therefore requests that DOE/FECM issue an order expeditiously granting the authorization requested in the Application without modification or delay.

In support of this Application, Applicant respectfully states as follows:

¹ 15 U.S.C. § 717b.

² 10 C.F.R. Part 5.90.

³ 15 U.S.C. § 717b(c) (“For purposes of this section . . . the exportation of natural gas to a 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 applications for such [] exportation shall be granted without modification or delay.”).

I.
DESCRIPTION OF APPLICANT

The exact legal name of Applicant is Texas Pipeline Exports, LLC. Applicant is a limited liability company organized under the laws of Texas. Applicant is engaged in natural gas distribution, supply, and marketing. Applicant has its principal place of business at 16211 La Cantera Parkway, Suite 202, San Antonio, Texas 78256.

II.
COMMUNICATIONS AND CORRESPONDENCE

All communications and correspondence regarding this Application, including all service of pleadings and notice, should be addressed to the following persons:

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III.
PROJECT DESCRIPTION

Applicant requests long-term authorization to export up to 18.9627 Bcf per year of natural gas to Mexico via pipeline. Applicant plans to export such natural gas to Mexico for commercialization and local distribution.

Applicant has entered into an agreement to purchase existing natural gas infrastructure, including the below described Border Crossing Facilities that will be used to export the natural gas that is the subject of this Application. The Border Crossing Facilities will be transferred to Applicant on the date that the Federal Energy Regulatory Commission presidential permits associated with such Border Crossing Facilities are transferred to Applicant. Applicant has taken

assignment of certain transportation service agreements (“TSA”) with Coahuila Energy, LLC (“Coahuila”) and All Gas US, LLC (“All Gas”). Applicant will have the right to transport up to 9,079,203 million British thermal units (“MMBtu”), but at least 4,467,154 MMBtu per year of natural gas under the All Gas TSA and up to 25,000 MMBtu per day under the Coahuila TSA, in each case, across the U.S.-Mexico border at the following facilities:

- Eagle Pass Facilities (I) - These facilities consist of approximately 400 feet of 12-inch diameter pipeline located at the International Border near Eagle Pass, Maverick County, Texas. The facilities extend from intrastate pipeline facilities in Texas to an interconnection with pipeline facilities owned by Compania Nacional de Gas, S.A. de CV in Mexico. The facilities currently provide transportation service to the local distribution company in Piedras Negras, Mexico, and also facilitate natural gas sales at the border (the “EP I Facilities”);
- Eagle Pass Facilities (II) - These facilities consist of two parallel 8-inch diameter pipelines located at the International Border near Eagle Pass, Maverick County, Texas. The facilities extend from intrastate pipeline facilities in Texas to an interconnection with pipeline facilities owned by Compania Nacional de Gas, S.A. de CV near Piedras Negras, Mexico. The facilities currently provide transportation service to the local distribution company in Piedras Negras, Mexico (the “EP II Facilities”); and
- Del Rio Facilities - These facilities consist of approximately 400 feet of 8- inch diameter pipeline located at the International Border approximately 3.25 miles northwest of the International Highway Bridge that is owned by the City of Del Rio in Val Verde County, Texas. The facilities extend from intrastate pipeline facilities in Texas to an interconnection with pipeline facilities owned by Gas Natural Industrial, S.A. de CV in Mexico. The facilities are used to make natural gas sales at the border (the “Del Rio Facilities” and together, with the EP I Facilities and the EP II Facilities, the “Border Crossing Facilities”).

In accordance with DOE’s regulations,⁴ Applicant is filing confidential versions of the Coahuila and All Gas TSAs under seal due to the sensitive commercial terms contained in those agreements. Brief summaries of these TSAs are provided in the public version of Appendix C to this Application.

IV. REQUESTED AUTHORIZATION

Applicant requests long-term, multi-contract authorization to export up to 18.9627 Bcf per

⁴ 10 C.F.R. §§ 590

year of natural gas to Mexico via pipeline for a term commencing on the date this application is approved and extending until December 31, 2030, on its own behalf. Applicant additionally requests to export natural gas as an agent of the applicable natural gas title holders. Applicant will source the natural gas from the Eagle Ford Shale formation in the state of Texas. Applicant will fully comply with all applicable DOE/FECM requirements for both exporters and their agents, including but not limited to registering with DOE/FECM each natural gas title holder that Applicant seeks to export natural gas as agent and providing DOE/FECM a written statement by the title holder that acknowledges and agrees to (1) comply with all requirements in Applicant's long-term export authorization and (2) include those requirements in any subsequent purchase or sale agreement entered into by the title holder.

Applicant currently has a blanket authorization to export up to 50 Bcf of natural gas to Mexico via pipeline pursuant to DOE/FECM Order No. 5259 in Docket No. 25-10-NG for a two-year term that began on March 12, 2025. Upon issuance of the long-term authorization requested herein, Applicant requests that the DOE automatically vacate such blanket short-term authorization, with such vacatur to be effective the same date that the long-term authorization requested herein becomes effective.

V. **PUBLIC INTEREST STANDARD**

The authorization requested in the Application is consistent with the public interest. Section 3(a) of the NGA states that DOE/FECM shall authorize the export of natural gas unless DOE/FECM “finds that the proposed exportation . . . will not be consistent with the public interest.”⁵ Under Section 3(c) of the NGA, “the exportation of natural gas to a nation with which there is in effect a free trade agreement requiring national treatment for trade in natural gas, shall

⁵ 15 U.S.C. § 717b(a).

be deemed to be consistent with the public interest, and applications for such [] exportation shall be granted without modification or delay.”⁶ Because Applicant requests authorization for the export of natural gas from the United States to Mexico, a nation with which an FTA requiring national treatment for trade in natural gas is in effect, such authorization meets the criterion of NGA Section 3(c) and is therefore consistent with the public interest. As such, Applicant requests DOE/FECM to grant this Application without modification or delay, consistent with Section 3(c) of the NGA.

VI. **ENVIRONMENTAL IMPACT**

The authorization requested in the Application is not expected to have any environmental impacts. The natural gas to be exported pursuant to such authorization will be transported over existing pipeline facilities within the United States, across the U.S.-Mexico border, and within Mexico. No new facilities or major facility modifications or additions will be required in order for Applicant to export such natural gas to Mexico from the United States. Consequently, granting this Application will not constitute a federal action significantly affecting the quality of the human environment within the meaning of the National Environmental Policy Act. Therefore, an environmental impact statement or environmental assessment is not required.

VIII. **APPENDICES**

The following appendices are submitted as part of this Application:

Appendix A: Verification

Appendix B: Opinion of Counsel

Appendix C: Confidential Versions of Coahuila and All Gas TSAs

Filed under seal pursuant to 10 C.F.R. §§ 590.202(e) and 1004.11

⁶ *Id.* at § 717b(c).

IX.
CONCLUSION

WHEREFORE, for the foregoing reasons, Applicant respectfully requests that DOE/FECM grant, without modification or delay, Applicant's request for authorization to export up to 18.9627 Bcf per year of natural gas to Mexico via pipeline for a term commencing on the date of approval of this Application.

Respectfully submitted,

/s/ Andrew Kriha

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Attorneys for Texas Pipeline Exports, LLC.

Dated: November 13, 2025

Appendix A

Verification

Verification

State of TEXAS

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) ss.

County of Bexar

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I, TJ Campbell, being first duly sworn, hereby affirm that: as Executive Vice President, General Counsel and Corporate Secretary of Texas Pipeline Exports, LLC, I am authorized to execute this verification on behalf of Texas Pipeline Exports, LLC. I have read the foregoing Application and am familiar with the contents thereof; and that all allegations of fact therein contained are true and correct to the best of my knowledge, information, and belief.



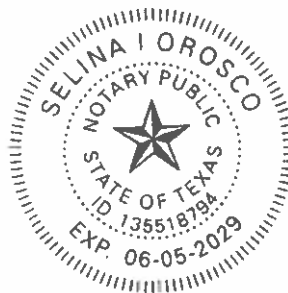
***Executive Vice President, General Counsel and
Corporate Secretary***

Subscribed and sworn to before me
this 13 day of November, 2025

Notary Public S. Orusco

My Commission Expires: 06-05-2029

November 13, 2025



Appendix B

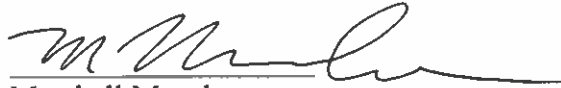
Opinion of Counsel

Opinion of Counsel

This opinion is submitted pursuant to Section 590.202(c) of the Department of Energy administrative procedures. The undersigned is counsel to Texas Pipeline Exports, LLC.

I have reviewed the corporate documents and it is my opinion that the proposed import/export of natural gas is/are within the company's corporate powers.

Respectfully submitted,


Marshall Moorhouse
Counsel

Appendix C

***Public Summaries of All Gas and Coahuila TSAs –
Confidential Information Removed
Pursuant to 10 C.F.R. §§ 590.202(e) and 1004.11***

APPENDIX C

Public Summaries of All Gas and Coahuila TSAs

1. All Gas TSA

Parties: All Gas US, LLC and Texas Pipeline Exports, LLC (assigned from WTG Gas Marketing, Inc.)

Execution Date: June 1, 2023

Service: Firm Transportation (Variable Quantity)

Service Commencement Date: June 1, 2023

Term: Through December 31, 2030

Receipt Point(s): Interconnect with Eagle Ford Midstream, LP in La Salle County, Texas (Meter #57050)

Delivery Point(s): Interconnects of WTG Utility and Gas Natural Industrial; Meter # 781-009

Volumes: Up to 9,079,203 MMBtu per year, but at least 100% of the volume needs of the customer's facility with a minimum obligation of 4,567,154 MMBtu per year.

2. Coahuila TSA

Parties: Coahuila Energy, LLC and Texas Pipeline Exports, LLC (assigned from WTG Gas Marketing, LLC)

Execution Date: January 1, 2025

Service: Firm Transportation (Variable Quantity)

Service Commencement Date: January 1, 2025

Term: Through December 31, 2030

Receipt Point(s): Interconnect with Eagle Ford Midstream, LP in La Salle County, Texas (Meter #57050)

Delivery Point(s): Mexico #1 (Meter #781-066); Customs Sales (Meter #781-009)

Volumes: Up to 25,000 MMBtu per day