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December 12, 2025

RECEIPT REQUESTED

Via Electronic Filing: *fergas@hq.doe.gov*

Office of Regulation, Analysis and Engagement
Office of Fossil Energy and Carbon Management
U.S. Department of Energy
1000 Independence Avenue SW
Washington, DC 20585

Re: *Epcilon LNG LLC*
DOE/FE Order No. 4629
FE Docket No. 20-31-LNG

Request of Epcilon LNG LLC for Amendment of Long-Term Authorizations to Export Liquefied Natural Gas to FTA and Non-FTA Countries and for Extension of Time to Commence Exports

Dear Ms. Ulrey:

On December 8, 2020, the U.S. Department of Energy, Office of Fossil Energy (“DOE/FE”) issued Order No. 4629 granting Epcilon LNG LLC (“Epcilon”) a long-term authorization to export natural gas to Mexico for liquefaction and re-export such natural gas as liquefied natural gas (“LNG”), from Mexico to nations with which the United States has (“FTA”), and does *not* have (“NFTA”), free trade agreements requiring national treatment in trade of natural gas.

Epcilon respectfully submits this letter to the U.S. Department of Energy, Office of Fossil Energy and Carbon Management (“DOE/FE”), to request an extension of time to commence exports from its authorized export facilities.

This request is made in accordance with DOE/FE regulations and consistent with prior orders granting similar extensions to other export authorization holders, including those issued in recent years to Delfin LNG and Lake Charles LNG.

Epcilon continues to make substantial progress in advancing the project, but in the past, it has encountered significant and unforeseen delays due to global macroeconomic and geopolitical disruptions, as further detailed below. **All of these delays have been fully resolved now, and Epcilon intends to take FID (Final Investment Decision) in early Q1 2026 for the Amigo LNG export terminal project in Guaymas, Sonora, Mexico.** For these reasons, Epcilon respectfully requests an extension of the deadline to commence exports by an additional 24 months, from

December 8, 2027 to December 8, 2029, to preserve its authorization and facilitate the realization of its long-term LNG export project from Mexico.

Epsilon respectfully requests that the Department of Energy's Office of Fossil Fuel and Carbon Management approve the Extension Application on or before January 22, 2026, aligned with Epsilon's plan for achieving positive FID within early Q1 2026.

I. Background and Overview of Epsilon's Authorizations

On March 23, 2020, Epsilon filed an Application with the Office of Fossil Energy (FE) of the U.S. Department of Energy (DOE) under Section 3 of the Natural Gas Act (NGA), seeking long-term, multi-contract authorization to export domestically produced natural gas from the United States to Mexico, and after liquefaction in Mexico, to deliver and consume a portion of the LNG in Mexico and to re-export the LNG as follows:

- (i) under section 3(c) of the NGA, to countries with which the United States has entered into a free trade agreement (FTA) requiring national treatment for trade in natural gas (FTA countries); and
- (ii) under section 3(a) of the NGA, to any other country with which trade is not prohibited by U.S. law or policy (non-FTA countries).

Epsilon sought the authorization in a volume equivalent to 395 billion cubic feet per year (Bcf/yr) of natural gas, or 1.083 Bcf per day (Bcf/d), to both FTA and non-FTA countries on a non-additive basis.

On December 8, 2020, the DOE via DOE/FE order no. 4629, granted Epsilon authorization to export volume of 395 Bcf/yr (1.083 Bcf/d) to both FTA countries (including Mexico) and non-FTA countries for a period of 20 years, commencing on the earlier of the date of first export or seven years from the date of the final order granting export authorization.

Epsilon's project ('Amigo LNG'), located near Port of Guaymas, Sonora, Mexico, is uniquely positioned to serve global LNG markets using a cross-border gas supply from the U.S., leveraging existing pipeline infrastructure from the Permian Basin, and deploying floating LNG (FLNG) technology to accelerate time to market while minimizing onshore impact.

II. Reasons for Request: Delays Beyond Epsilon's Control

Epsilon remains fully committed to advancing its project and exporting U.S.-produced LNG but in the past had encountered numerous challenges that significantly impacted the original development timeline. These issues include:

1. COVID-19 Pandemic and Global Supply Chain Disruptions

The global pandemic had a material and prolonged impact on project execution timelines. From 2020 through 2022, COVID-19 disrupted:

- Engineering and procurement activities.

- Access to qualified and experienced fabrication yards with LNG experience.
- In-person regulatory and permitting processes in Mexico.

The cascading impact of these disruptions continued well beyond the pandemic's peak, particularly with respect to supply chain constraints for long-lead equipment, increased freight costs, and reduced availability of LNG-qualified shipyards.

2. Geopolitical uncertainty and policy fragmentation in Asian demand markets

Over the past several years, specifically until end of 2024, persistent geopolitical uncertainty and evolving policy frameworks across key Asian LNG demand markets have materially affected the pace of commercial decision-making. These factors included:

- Reduced commercial certainty for long-term supply and demand commitments, particularly among utilities and portfolio players in Asia.
- Temporary policy emphasis in certain markets on early-stage, low-cost green hydrogen and alternative energy concepts that had not yet reached commercial or bankable maturity, which further affected near-term offtaker sentiment.
- Resulting delays in finalizing definitive commercial arrangements with key stakeholders, which in turn impacted the sequencing and timing of procurement and project execution activities.

Collectively, these market conditions contributed to a deferral in the project's original development timeline.

These issues have now been fully resolved. As of December 2025, Amigo LNG has secured more than adequate binding long-term LNG offtake commitments with multiple investment-grade counterparties under executed Sales and Purchase Agreements (SPAs). The strength and diversity of these commitments reaffirm U.S. LNG—exported via Mexico—as a competitive, reliable, and geopolitically resilient supply solution for Asian markets.

With commercial risk substantially mitigated and offtake firmly secured, the Amigo LNG project is now positioned to advance toward imminent FID.

3. Adoption of New FLNG Technology and Project Compact Design

Epsilon has made a strategic shift toward modular, compact FLNG technology, inspired by recent innovations in floating production. This re-design:

- Enhances environmental performance and cost efficiency.
- Reduces footprint on land and aligns with community and regulatory expectations in Mexico.

- Requires additional front-end engineering ('FEED'), safety reviews, and regulatory consultation.

The transition to this new architecture necessitated revisions to permitting applications and environmental assessments, contributing to project delays. As of December 2025, the new FLNG design has gone thru completion of FEED process, independent FEED validation, satisfactory safety assessments, and compliance with regulatory requirements of Mexico and international standards.

4. Regulatory Delays in Mexico (CRE & Other Agencies)

The project was affected by substantial administrative delays in Mexico, including:

- The dissolution and restructuring of Mexico's Energy Regulatory Commission (CRE), which has resulted in extended processing times for key licenses and creation of a new regulatory agency Comisión Nacional de Energía (CNE). *In Mexico, CNE is the new, centralized energy regulatory body established as part of major 2025 energy reforms, replacing previous independent regulators like CRE and CNH, operating under the Ministry of Energy (SENER) to consolidate state control, issue permits, set tariffs, and oversee the electricity and hydrocarbon sectors with a focus on policy modernization.*
- Delay in issuance of permits for gas transportation and LNG export.
- Lack of procedural clarity and shifting regulatory priorities at the federal level.

Notwithstanding the foregoing, these administrative and regulatory matters have now been substantially resolved. Amigo LNG has secured its LNG export permit from the Secretaría de Energía (SENER) in September 2024 and was granted the required marine concession by the Secretaría de Marina (SEMAR) in July 2025. In parallel, the project has successfully achieved and cleared multiple key regulatory and permitting milestones with relevant federal and state authorities, including the Comisión Nacional de Energía (CNE), the Agencia de Seguridad, Energía y Ambiente (ASEA), and the Instituto Nacional de Antropología e Historia (INAH), among others. Collectively, these approvals materially de-risk the project from a regulatory standpoint and support its advancement toward Final Investment Decision and execution.

5. Delays in Land Use and Title Conversion

Several critical milestones related to site development in Mexico were impacted by land-related issues, including:

- Delayed conversion of land use permits from state land to private industrial use.
- Delays in land registration and transfer of title necessary to support final investment decisions and long-term facility operation.

Epsilon worked closely with local and federal authorities to resolve these issues, managed the bureaucratic complexities, and has currently resolved all of the above issues favorably.

6. LNG Shipyard Availability Constraints

Global LNG demand recovery and a sharp increase in newbuild orders reduced available shipyard slots for specialized FLNG construction.

- Access to critical FLNG fabrication and modular construction services, many of which are based in East Asia was limited.
- The capacity constraints affected Epsilon's timeline to contract and secure fabrication windows, which are essential for project execution.

Over the 2024-2025 period Epsilon worked across the potential spectrum of qualified EPC contractors with FLNG fabrication facilities and capabilities, and identified Drydocks World in Dubai, UAE, which satisfied all the qualification criteria. During the Q3 2025, the EPC contract for the conversion of Floating Storage Units ("FSU") and the fabrication of newbuild FLNG barges was signed with Drydocks World from Dubai, UAE, successfully overcoming the constraints.

7. Long-Lead Equipment Procurement Challenges

The sourcing and manufacturing timelines for mixed refrigerant compressors, cryogenic heat exchangers, gas turbines, power generation equipment, gas pre-treatment packages, cryogenic pumps, LNG loading arms, and boil-off gas handling equipment had extended significantly due to global backlogs and material shortages between 2021 to 2024.

During 2025, all long lead items have been secured with vast majority of the equipment, being U.S. manufactured, U.S. sourced (e.g. Chart Industries, USA; UOP Honeywell, USA; Baker Hughes, USA; Honeywell Automation and Controls, USA and multiple other US made equipment), and manufacturing slots secured for all critical long lead equipment, positioning the Amigo LNG project closer to FID in Q1 2026.

8. Shortage of Qualified EPC Contractors in Mexico

Local Mexico based EPC Contractors during the 2022-2024 period, were engaged in multiple large-scale infrastructure projects, significantly limiting their availability to align with our proposed construction timeline.

- Some of the Mexican EPC firms declined to provide lump-sum proposals, introducing cost uncertainty and further contributing to project delays.
- There is a lack of qualified EPC contractors in Mexico as there has been no major LNG plant construction within the mid- to large capacity range.

During late 2024, Amigo LNG engaged in detailed assessment of the local Mexican EPC contractors, and identified a potential company, which had excellent track record in EPC for marine facilities (jetty, trestle, mooring, coastal structures, loading platform). Based on a year long process, during Q3 2025, a Letter of Award was signed with Constructora Manzanillo SA de CV ("Comsa Marine") for the EPC of marine infrastructure.

III. Request for Relief

Based on the foregoing, Epcilon respectfully requests that the U.S. Department of Energy:

1. **Amend the existing long-term authorizations issued under FE Docket No. 20-31-LNG** to reflect the updated project development and construction schedule, with construction expected to commence in the first quarter of 2026, a planned construction duration of approximately thirty-four (34) months, and commissioning targeted on or before the first quarter of 2029.
2. **Grant a twenty-four (24) month extension of the export commencement deadline** under both the Free Trade Agreement (FTA) and non-Free Trade Agreement (non-FTA) export authorizations, extending the current deadline from December 8, 2027 to December 8, 2029.

This extension aligns with precedent DOE decisions in the cases of Delfin LNG (FE Docket 13-147-LNG) and Lake Charles LNG (FE Docket 13-04-LNG), where similar relief was granted based on comparable project development delays.

IV. Continued Progress, Commitment and Readiness for FID

Despite the aforementioned challenges, Epcilon continues to make tangible progress, including:

Epcilon's Permitting Progress and Milestones achieved

Summary of Regulatory permits approved for AMIGO LNG S.A. de C.V (subsidiary of Epcilon) across federal, state and municipal levels till date:

Permit	Issuer	Approved date	Permit holder	Duration
Mexico LNG Export permit	Secretaría de Energía (SENER)	26-Sep-2024	AMIGO LNG S.A. de C.V.	20 years
Land Lease and Use permit	Sonora State Government	30-Sep-2022	AMIGO LNG S.A. de C.V.	30 years
Coastal Land Title	Sonora State Government	23-Apr-2024	AMIGO LNG S.A. de C.V.	Lifetime
Marine Concession	Secretaría de Marina (SEMAR)	17-Jul-2025	AMIGO LNG S.A. de C.V.	36 years
Technical permits		Filling date		
Congruency Report	Secretary of Infrastructure and Urban Development	25-Mar-2025	AMIGO LNG S.A. de C.V.	Lifetime

Technical Justification Study for Land-Use Change (ETJ)	Agencia de Seguridad Energia y Medio Ambiente (ASEA)	08-Sep-2025	AMIGO LNG S.A. de C.V.	Lifetime
Archaeological permit	National Institute of Anthropology and History (INAH)	8-Jul-25	AMIGO LNG S.A. de C.V.	Lifetime
Land Use Feasibility	Urban Control Guaymas Municipality	30-Jun-25	AMIGO LNG S.A. de C.V.	Lifetime

Some salient features include:

- ✓ Epsilon’s subsidiary currently holds the longest tenure (20 years) for LNG export authorization in Mexico. In contrast, comparable companies have received permits valid for only five years, subject to renewal upon meeting specific regulatory conditions.
- ✓ Epsilon’s subsidiary currently holds one of the largest waterplane area thru the ASIPONA Guaymas/ SEMAR marine sub-concession.
- ✓ The Amigo LNG project encompasses a total site area of approximately 290 acres, of which more than 150 acres will be permanently designated as protected green space for the conservation of local flora and fauna, reflecting the project’s strong commitment to environmental stewardship and ESG principles.

Epsilon’s Engineering Progress

- ✓ Completed front-end engineering design (FEED) for the project and revised the FEED with modular FLNG systems.
- ✓ Epsilon has over 100 professionals actively engaged on the Project across disciplines of engineering and construction, finance, commercial development, legal, public relations, and government affairs. In addition, multiple third-party consulting firms are supporting the Project with specialized expertise in engineering, construction, commercial strategy, and financial advisory services.

Commercial Milestones

- ✓ Long term LNG Offtake Sales and Purchase Agreements (SPAs) signed with Sahara Group, OQT – Oman, Gunvor Group and Macquarie, as reported earlier with U.S, DOE.
- ✓ Two additional SPAs are in advanced stages of negotiation stages, with more than adequate offtake capacity lined up.
- ✓ Multiple Gas Supply Agreement (GSAs) lined up and ready for execution in sync with FID, with the secured GSA volume of more than 750 mmscfd.
- ✓ Honoring long-term alliances by continuing to engage with U.S. pipeline interconnects for cross-border gas delivery.

Economic Benefits to USA

Epsilon is procuring major process and equipment packages from leading U.S. suppliers, including Chart Industries, Baker Hughes, Honeywell, and UOP, with an aggregate procurement value exceeding USD 1.2 billion. In addition, the project incorporates substantial U.S.-origin engineering services, technology licenses, consultancy support, specialized service providers, and U.S. investor participation, further strengthening the U.S. economic content of the project.

In 2024, the United States recorded a significant goods trade deficit with Mexico of approximately USD 171.8 billion, making Mexico the second-largest U.S. goods trade deficit partner. The export of approximately 7.8 million tonnes per annum (MTPA) of LNG from the Amigo LNG project is expected to generate roughly USD 1.2 billion in annual trade value, based on equivalent natural gas volumes sourced from the Permian Basin in Texas at an assumed price of USD 3.00 per MMBtu.

On an ongoing basis, U.S.-sourced goods and services are expected to account for up to approximately seven percent (7%) of the terminal's annual operating revenues. Operations and maintenance (O&M) expenditures and recurring service requirements—including spare parts, consumables, maintenance equipment, long-term service agreements, and the asset management agreement—are projected to result in an additional approximately USD 200 million per year in U.S. goods and services procured through the project's operations.

Based on industry-standard economic multipliers associated with U.S. natural gas production and export infrastructure, each USD 1 billion of investment deployed in Mexico through the Amigo LNG project is estimated to directly create and sustain approximately 600 to 700 jobs annually in the United States, with an additional multiplier effect supporting approximately 1,300 indirect U.S. jobs.

In Summary

Epsilon LNG remains firmly committed to delivering a clean, efficient, and globally competitive LNG export solution that supports U.S. energy exports and enhances regional and global energy security. The Amigo LNG project continues to be an active, fully supported development, and Epsilon LNG LLC is prepared to advance the project toward a positive Final Investment Decision (FID) by the first quarter of 2026.

Project financing structures for large-scale LNG developments customarily require the maintenance of valid, long-term regulatory authorizations throughout the full development and construction cycle. Accordingly, the requested extension is intended to align the existing authorizations with the realistic and fully defined timeline required to achieve in-service conditions for the Amigo LNG project. Granting this extension will support the orderly progression of financing, FID, and the commencement of full-scale construction.

Given the substantial scope and complexity of the liquefaction facilities and associated export infrastructure, construction of the Amigo LNG project is expected to require approximately thirty-four (34) months following FID to reach Commercial Operations Date (COD). This implies, COD could occur as early as the fourth quarter of 2028.

For above reasons, Epcilon respectfully seeks a twenty-four (24) month extension of the export commencement deadline, from December 8, 2027 to December 8, 2029.

Epcilon further confirms that this request is limited solely to an extension of time and does not seek any modification to the scope, configuration, or nature of the Amigo LNG project. The project has not undergone any material changes, and the public interest determinations supporting the Department of Energy's existing export authorizations remain valid. Granting the requested extension will not alter or undermine DOE's findings that the Amigo LNG project is consistent with the public interest.

V. Conclusion

For the reasons outlined above, Epcilon respectfully requests that the US Department of Energy approve the amendment and grant the requested 24-month extension to commence exports, in accordance with established DOE precedent and in the public interest. This extension will enable to project to reach FID and proceed to the construction phase, hereby supporting U.S LNG export objectives and strategic economic engagement with Mexico as well as global markets.

We appreciate your continued support and consideration of this request. Please do not hesitate to contact us should you require any further information.

If you have any questions or require any additional information, please do not hesitate to contact me at (713) 240-2631 or mc@lngalliance.com.

Sincerely,

A handwritten signature in blue ink, appearing to read "Muthu Chezhian", with a stylized flourish at the end.

Muthu Chezhian

*President
Epcilon LNG LLC,
Texas, USA*

VERIFICATION

I, Alberto Nafarrate López, Legal Counsel of AMIGO LNG S.A. de C.V., a subsidiary of Epsilon LNG LLC hereby verify that the information contained within this document is true, accurate, and duly authorized by the relevant parties. This verification is made in good faith for all legal and administrative purposes relating to the requested extension and project obligations.

Signed on December 12, 2025, at Hermosillo, Sonora, Mexico.

A handwritten signature in blue ink, appearing to be 'Al', with a horizontal line extending to the left and a loop at the bottom.

Alberto Nafarrate López
Legal Counsel on behalf of Epsilon LNG LLC