

Docket No. 15-190-LNG (Rio Grande LNG Change in Control)

**Docket No. 15-190-LNG – Change in Control: Rio Grande LNG, LLC; Train 4; Train 5
Sworn Analytic Statement under the APA, PRA, Fairness, and OMB A-4**

Docket: **15-190-LNG**

Agency/Office: **DOE – Office of Fossil Energy & Carbon Management (FECM)**

Subject: **Upstream ownership change including foreign-affiliate equity stake with continued U.S. operational control.**

By: **James Hunter Poole, Executive Chairman & CEO, Obelisk Tech Systems Inc.**

Location: **Thomasville, Georgia**

Submission Type: **Sworn analytic comment + administrative evidence entry**

1. Purpose (Plain English)

DOE notice confirms the Rio Grande LNG entities filed a CIC statement describing a change in upstream ownership tied to foreign-affiliate equity participation, while domestic operations remain with the U.S. operator.

This sworn analytic comment places material evidence into the record that late-stage ownership shifts in LNG exports require cross-agency verification, national-security posture clarity, and explicit workforce-risk accounting.

2. Standing and Evidence-Building Authority

I submit as Executive Chairman & CEO of Obelisk Tech Systems Inc., an American advanced-technology company holding a USPTO portfolio aligned to critical-infrastructure AI, secure verification, quantum-resilient encryption, and satellite-relay resilience.

I have standing as inventor-executive providing audit-grade modernization capability to federal infrastructure systems.

3. Administrative Energy & Oversight Flywheel

A Rio Grande CIC filing propagates through DOE export review, FERC terminal lanes, Treasury/CFIUS considerations if triggered, OIRA coordination, and IG/GAO audit chains. A modern evidence flywheel is required to prevent mismatch, delay, or control ambiguity.

4. Cross-Agency and Statutory Relevance

This docket materially implicates:

- Natural Gas Act public-interest standards.
 - APA/PRA evidence and burden controls.
 - OMB A-4/A-11 cost-benefit, record retention, and verification standards.
 - Executive Order 12866 interagency circulation.
 - Foreign ownership screening where applicable.
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5. Patent / Portfolio Relevance (SBIR/STTR Fit)

Rio Grande CIC oversight and export reliability require quantum-safe comms, tamper-evident chain-of-custody, federated anomaly detection, and resilient telemetry. Obelisk patents enabling this include:

1. **CryptexQ Quantum-Resilient FPGA Encryption** — Application **63/909,875**.
2. **Adaptive Multimodal Security Fusion + Chain-of-Custody System** — Application **63/881,268**.
3. **Federated Learning Data Isolation for Critical-Infrastructure AI** — Application **63/909,864**.

4. **Satellite-Based AI Imaging Relay / Vigilant Orbit** — Application **63/909,876**.
5. **AI-Driven Mineral Field Detection & Strategic Supply-Chain Mapping** — Application **63/909,860**.

This stack uniquely supports secure export-authorization evidence trails and operational resilience, making Obelisk a high-confidence SBIR/STTR modernization partner.

6. Employment & Human-Impact Narrative

Energy export projects anchor long-term regional employment. When approvals bog down or ownership transparency fails, layoffs arrive first and recovery is slow. South Georgia’s industrial collapse proved how fast communities can be destabilized when modernization lags: **1,600+ jobs disappeared**, and the ripple still spreads.

DOE’s CIC design must treat these impacts as material evidence.

7. Risk / Loss Assessment (Non-Adoption)

Without modern CIC evidence standards:

- PRA duplication expands.
 - Ownership/control mismatch risks grow.
 - Domestic suppliers lose investment certainty.
 - Oversight burdens compound across OIRA/GAO/OIG/Congress.
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8. Interagency Coordination & Notification Request

Please circulate this evidence under Executive Order 12866 §6(b)(1) to OIRA, DOE/FECM CIC staff, GAO, DOE-OIG, and relevant partners including FERC, DHS, and Treasury/CFIUS lanes if triggered.

9. Administrative Determination Requested

Determine this sworn record is material under OMB A-4 and APA §706, preserve it permanently, and require CIC review to incorporate cryptographically auditable verification lanes, explicit workforce impact accounting, and cross-agency screening sufficiency.

10. Signature Block and Sworn Declaration

I, **James Hunter Poole**, declare under penalty of perjury pursuant to **28 U.S.C. §1746**, and consistent with **APA/PRA/OMB A-4/A-11**, that the foregoing information is true and correct and is submitted for permanent inclusion in the administrative docket.

Executed this **30th day of November 2025**.

Signature: _____

James Hunter Poole

Executive Chairman & Chief Executive Officer

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