

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

**In The Matter Of:**

**Rio Grande LNG, LLC  
Rio Grande LNG Train 4, LLC  
Rio Grande LNG Train 5, LLC**

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**FE Docket No. 15-190-LNG**

**APPLICATION FOR AMENDMENT TO AUTHORIZATIONS TO EXPORT  
LIQUEFIED NATURAL GAS TO  
FREE TRADE AND NON-FREE TRADE AGREEMENT COUNTRIES**

Pursuant to Section 3 of the Natural Gas Act (“NGA”)<sup>1</sup> and Part 590 of the Department of Energy’s (“DOE”) regulations,<sup>2</sup> Rio Grande LNG, LLC (“RGLNG”), Rio Grande LNG Train 4, LLC (“RGLNG 4”) and Rio Grande LNG Train 5, LLC (“RGLNG 5” and collectively with RGLNG and RGLNG 4, the “RGLNG Entities”) hereby submit this application (“Application”) to DOE’s Office of Fossil Energy and Carbon Management (“DOE/FECM”)<sup>3</sup> for an amendment to the Authorizations<sup>4</sup> issued to the Rio Grande Entities to engage in long-term, multi-contract exports of domestically produced liquefied natural gas (“LNG”) from the Rio Grande LNG Terminal (or “Terminal”).<sup>5</sup> Specifically, the RGLNG Entities request that DOE/FECM amend the

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<sup>1</sup> 15 U.S.C. § 717b.

<sup>2</sup> 10 C.F.R. Part 590 (2024).

<sup>3</sup> DOE/FECM was previously known as the Department of Energy, Office of Fossil Energy or “DOE/FE”. In this regard, DOE/FECM is used herein except with respect to citations to documents.

<sup>4</sup> *Rio Grande LNG, LLC*, Order Granting Long-Term, Multi-Contract Authorization to Export Liquefied Natural Gas By Vessel From the Proposed Rio Grande LNG Terminal in Brownsville, Texas, to Free Trade Agreement Nations, DOE/FE Order No. 3869, FE Docket No. 15-190-LNG (Aug. 17, 2016) (hereinafter, “*Order No. 3869*”), *Rio Grande LNG, LLC*, Opinion and Order Granting Long-Term Authorization to Export Liquefied Natural Gas to Non-Free Trade Agreement Nations, DOE/FE Order No. 4492, FE Docket No. 15-190-LNG (Feb. 10, 2020) (hereinafter, “*Order No. 4492*”), *Rio Grande LNG, LLC*, Order Extending Export Term for Authorization to Non-Free Trade Agreement Nations Through December 31, 2050, DOE/FE Order No. 4492-A, FE Docket No. 15-190-LNG (Oct. 21, 2020) (hereinafter, “*Order No. 4492-A*”), *each as amended*, *Rio Grande LNG, LLC, Rio Grande LNG Train 4, LLC & Rio Grande LNG Train 5, LLC*, Order Granting Request to Amend Authorizations to Export Liquefied Natural Gas to Add Authorization Holders, DOE/FECM Order Nos. 3869-A & 4492-B, FE Docket No. 15-190-LNG (Aug. 20, 2025) (collectively hereinafter, the “*Authorizations*”).

<sup>5</sup> The Rio Grande LNG Terminal is currently under construction on the north embankment of the Brownsville Ship Channel in Cameron County, Texas.

Authorizations to increase the annual authorized LNG exports to (i) any country with which the United States currently has, or in the future enters into, a free trade agreement (“FTA”) requiring national treatment for trade in natural gas (“FTA Countries”), and (ii) any other country with which trade is not prohibited by U.S. law or policy (“Non-FTA Countries”).

First, the RGLNG Entities request that DOE/FECM update the existing Authorizations to reflect the expected composition and heating value of LNG that will be exported by the RGLNG Entities, which is consistent with DOE’s standard conversion factor<sup>6</sup> for other LNG export facilities, to determine the billion cubic feet (“Bcf”) per year (“Bcf/y”) equivalent of the Terminal’s current LNG production capacity of 27 million tonnes per annum (“MTPA”), authorized by the Federal Energy Regulatory Commission (“FERC”), thereby increasing authorized exports from 1,318 Bcf/y to approximately 1,397.25 Bcf/y. Second, the RGLNG Entities request DOE/FECM authorize additional exports of 163.01 Bcf/y, consistent with an anticipated increase in the Terminal’s maximum LNG production capacity under peak operating conditions up to 30.15 MTPA, for which approval is currently pending before FERC. In this regard, the RGLNG Entities respectfully request that DOE/FECM increase the total authorized exports from the Terminal to approximately 1,560.26 Bcf/y.

The instant request to increase the authorized LNG export capacity does not result from any proposed modification of Terminal facilities previously authorized by FERC and merely reflects use of DOE/FECM’s standard conversion factor, and anticipated output during peak operating conditions under optimal circumstances. The RGLNG Entities respectfully request that DOE/FECM grant this Application in an expedited manner, by no later than September 17, 2026.

In support of this Application, the RGLNG Entities state as follows:

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<sup>6</sup> See *infra* n.16.

**I.**  
**DESCRIPTION OF THE APPLICANTS**

The exact legal name of RGLNG is Rio Grande LNG, LLC, the exact legal name of RGLNG 4 is Rio Grande LNG Train 4, LLC, and the exact legal name of RGLNG 5 is Rio Grande LNG Train 5, LLC. RGLNG a Texas limited liability company, and RGLNG 4 and RGLNG 5 are each a Delaware limited liability company. All three RGLNG Entities have a primary place of business located at 1000 Louisiana Street, Suite 3300, Houston, TX 77002, and each is registered to do business in the State of Texas.

**II.**  
**COMMUNICATIONS AND CORRESPONDENCE**

All correspondence and communications concerning this Application, including all service of pleadings and notices, should be directed to the following persons:

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Pursuant to Section 590.103(b) of DOE's regulations,<sup>7</sup> the RGLNG Entities hereby certify that the persons listed above and the undersigned are the duly authorized representatives of the RGLNG Entities.

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<sup>7</sup> 10 C.F.R. § 590.103(b).

### **III.** **BACKGROUND**

On December 23, 2015, as amended on June 7, 2016, RGLNG submitted an application to DOE/FECM requesting long-term authorization to export LNG to FTA and Non-FTA Countries in an amount up to 1,318 Bcf/y (“2015 Application”).<sup>8</sup> In the 2015 Application, RGLNG stated that it derived the requested volume of 1,318 Bcf/y by “taking the [Terminal’s] rated output of 27 MTPA and multiplying by 48.7 Bcf per million metric tons ... of natural gas.”<sup>9</sup> On August 17, 2016, DOE/FECM issued Order No. 3869, granting RGLNG’s authorization to export up to 1,318 Bcf/y of LNG from the Terminal to FTA Countries for a 30-year term,<sup>10</sup> and on February 10, 2020, DOE/FECM issued Order No. 4492, granting RGLNG’s authorization to export up to 1,318 Bcf/y of LNG to Non-FTA Countries for a term of 20 years (on a non-additive basis).<sup>11</sup> On October 21, 2020, DOE/FECM issued Order No. 4492-A, which amended Order No. 4492 and extended the term of RGLNG’s authorization to export LNG to Non-FTA Countries through the year 2050.<sup>12</sup> On August 20, 2025, DOE/FECM issued an order adding RGLNG 4 and RGLNG 5 as additional holders of the Authorizations.<sup>13</sup>

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<sup>8</sup> *Rio Grande LNG, LLC*, Application for Long-Term, Multi-Contract Authorization to Export Liquefied Natural Gas, FE Docket No. 15-190-LNG (Dec. 23, 2015), *as amended*, *Rio Grande LNG, LLC*, Amendment of Application for Long-Term, Multi-Contract Authorization to Export Liquefied Natural Gas, FE Docket No. 15-190-LNG (June 7, 2016).

<sup>9</sup> *2015 Application*, at 1, n.3.

<sup>10</sup> *Order No. 3869 & Rio Grande LNG, LLC, Rio Grande LNG Train 4, LLC & Rio Grande LNG Train 5, LLC*, Order Granting Request to Amend Authorizations to Export Liquefied Natural Gas to Add Authorization Holders, DOE/FECM Order No. 3869-A, FE Docket No. 15-190-LNG (Aug. 20, 2025) (together, the “*FTA Authorization*”).

<sup>11</sup> *Order No. 4492, Order No. 4492-A & Rio Grande LNG, LLC, Rio Grande LNG Train 4, LLC & Rio Grande LNG Train 5, LLC*, Order Granting Request to Amend Authorizations to Export Liquefied Natural Gas to Add Authorization Holders, DOE/FECM Order No. 4492-B, FE Docket No. 15-190-LNG (Aug. 20, 2025) (collectively, the “*Non-FTA Authorization*”).

<sup>12</sup> *See Order No. 4492-A*.

<sup>13</sup> *Rio Grande LNG, LLC, Rio Grande LNG Train 4, LLC & Rio Grande LNG Train 5, LLC*, Order Granting Request to Amend Authorizations to Export Liquefied Natural Gas to Add Authorization Holders, DOE/FECM Order Nos. 3869-A & 4492-B, FE Docket No. 15-190-LNG (Aug. 20, 2025).

On November 21, 2025, the RGLNG Entities filed an application with FERC in Docket No. CP26-31-000 (the “FERC Application”) for authorization to increase the Rio Grande LNG Terminal’s authorized maximum LNG production capacity from the currently authorized 27 MTPA to 30.15 MTPA, to align the approved production capacity of the Terminal with the actual anticipated liquefaction capability (from 5.4 to approximately 6.03 MTPA per train).<sup>14</sup> The revised production capacity reflects peak operating conditions under optimal circumstances and is consistent with the current Terminal design as approved by FERC. Critically, the proposed increase in production capacity involves no new construction, and no modification of facilities.

#### **IV. AUTHORIZATION REQUESTED**

Through this Application, the RGLNG Entities herein seek to update the conversion factor used to determine the Bcf/y equivalent of the MTPA production capacity authorized by FERC,<sup>15</sup> to reflect the expected composition and heating value of LNG that will be exported by the RGLNG Entities, which is consistent with DOE’s standard conversion factor “of 51.75 Bcf per million metric tons of dry natural gas.”<sup>16</sup> As noted above, the 2015 Application utilized a conservative

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<sup>14</sup> *Rio Grande LNG, LLC, Rio Grande LNG Train 4, LLC, & Rio Grande LNG Train 5, LLC*, Application for Limited Amendment of Authorizations Granted Under Section 3 of the Natural Gas Act, Docket No. CP26-31-000 (Nov. 21, 2025).

<sup>15</sup> *Rio Grande LNG, LLC & Rio Bravo Pipeline Company, LLC*, 169 FERC ¶ 61,131, at P 130 (2019) (“*FERC Authorization*”), as modified, *Rio Grande LNG, LLC & Rio Bravo Pipeline Company, LLC*, 183 FERC ¶ 61,046 (2023), as further modified, *Rio Grande LNG, LLC, Rio Grande LNG Train 4, LLC, Rio Grande LNG Train 5, LLC & Rio Bravo Pipeline Company, LLC*, 192 FERC ¶ 61,198 (2025).

<sup>16</sup> U.S. Dep’t of Energy, Small-Scale Natural Gas Exports; Notice of Proposed Rulemaking, 82 Fed. Reg. 41,570, 41,573 (Sept. 1, 2017) (“When converting from million metric tons to billion cubic feet, DOE uses a conversion factor of 51.75 Bcf per million metric tons of dry natural gas.”); see also, e.g., *Mexico Pacific Limited LLC*, Opinion and Order Granting Long-Term, Multi-Contract Authorization to Export U.S.-Sourced Natural Gas by Pipeline to Mexico For Liquefaction and Re-Export in the Form of Liquefied Natural Gas to Non-Free Trade Agreement Countries, DOE/FE Order No. 4312, Docket No. 18-70-LNG, at 1 n.7 (Dec. 14, 2018) (same); *Lake Charles LNG Export Company, LLC*, Opinion and Order Granting Long-Term, Multi-Contract Authorization to Export Liquefied Natural Gas by Vessel From the Lake Charles Terminal in Lake Charles, Louisiana, to Free Trade Agreement and Non-Free Trade Agreement Nations, DOE/FE Order No. 4010, Docket No. 16-109-LNG, at 3 n.14 (June 29, 2017) (“In converting Bcf to million metric tons, DOE/FE uses a conversion factor of 51.75 per million metric tons.”).

conversion factor of 48.7 Bcf per million metric tons of natural gas. In this regard, the RGLNG Entities respectfully request an amendment to the Authorizations to restate the previously approved export volumes using DOE's conversion factor, which equates 27 MTPA to approximately 1,397.25 Bcf/y. Updating the conversion factor underlying the Authorizations results in a nominal increase of approximately 79.25 Bcf/y and is consistent with the calculation currently used by DOE across other proceedings.<sup>17</sup>

Additionally, consistent with the increase in LNG production volumes requested in the FERC Application, the RGLNG Entities further request that DOE/FECM issue an order granting authorization to engage in exports in an amount up to an additional 163.01 Bcf/y (approximately equivalent to 3.15 MTPA, utilizing DOE's conversion factor) of domestically produced natural gas, via ocean going carrier, from the Terminal to FTA and Non-FTA Countries for a term through December 31, 2050.

The two above requested amendments will result in total authorized exports of LNG from the Terminal of up to 1,560.26 Bcf/y (approximately 30.15 MTPA). As noted above, the additional export volumes requested herein do not require construction of any new or modified facilities at the Terminal. The RGLNG Entities request authorization to engage in such exports both on their own behalf and as agent for other parties who may hold title to the LNG at the time of export. The RGLNG Entities request such authorization commencing on the first date of commercial export.

## **V. COMMERCIAL TERMS AND EXPORT SOURCES**

The RGLNG Entities, as well as their customers, will source feed gas either on the spot market or pursuant to long-term agreements. The RGLNG Entities have not yet entered into any long-term LNG contracts in conjunction with the additional volumes requested herein. In this

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<sup>17</sup> See generally *id.*

regard, and consistent with prior practice, the RGLNG Entities are not submitting transaction-specific information (*e.g.*, long-term supply agreements and long-term export agreements) at this time.<sup>18</sup>

## **VI.**

### **APPLICABLE LEGAL STANDARD**

DOE/FECM reviews requests for authorization to export LNG under Section 3 of the NGA. With respect to the RGLNG Entities' request for authorization to update the conversion factor underpinning the existing FTA Authorization and to engage in additional exports to FTA Countries, DOE/FECM must review the Application under Section 3(c) of the NGA, which states in relevant part that:

... 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.<sup>19</sup>

In accordance with Section 3(c) of the NGA, the update to the existing FTA Authorization to reflect DOE's MTPA to Bcf/y conversion factor and additional exports of LNG to FTA Countries requested in the instant Application are "deemed consistent" with the public interest, and the RGLNG Entities respectfully request that DOE/FECM issue an order authorizing such exports to FTA Countries "without modification or delay."<sup>20</sup>

With respect to the RGLNG Entities' request to update the existing Non-FTA Authorization and to engage in additional exports to non-FTA Countries, DOE/FECM must review the Application under Section 3(a) of the NGA, which states in relevant part that:

... no person shall export any natural gas from the United States to a foreign country or import any natural gas from a foreign country

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<sup>18</sup> See, *e.g.*, Order No. 3869, at 5; see also Order No. 4492, at 25.

<sup>19</sup> 15 U.S.C. § 717b(c).

<sup>20</sup> See *id.*

without first having secured an order of the Commission authorizing it to do so. The Commission *shall issue* such order upon application, unless, after opportunity for hearing, it finds that the proposed exportation or importation will not be consistent with the public interest.<sup>21</sup>

In accordance with Section 3(a) of the NGA, DOE/FECM must issue an order granting the requested export authorization, absent a finding that the proposed exports “will not be consistent with the public interest.”<sup>22</sup> In this regard, courts have consistently held that Section 3(a) of the NGA creates a presumption in favor of approval of an application for non-FTA authorization, and project opponents bear the burden of overcoming the presumption.<sup>23</sup> In light of the significant precedent approving exports from U.S. LNG terminal facilities, including from the Terminal, as well as the substantial evidence in the public record, as discussed below, DOE/FECM should find that the requested exports of LNG from the Terminal are not inconsistent with the public interest.

## **VII. THE REQUESTED AUTHORIZATION IS NOT INCONSISTENT WITH THE PUBLIC INTEREST**

As noted above, in Order No. 4492, DOE/FECM previously found that exports from the Terminal to Non-FTA Nations are not inconsistent with the public interest. The additional exports contemplated herein do not alter DOE/FECM’s findings in that regard.

Moreover, DOE’s review of non-FTA applications focuses on: (i) the domestic need for the LNG proposed to be exported, (ii) whether the proposed exports pose a threat to the security of domestic natural gas supplies, (iii) whether the arrangement is consistent with DOE’s policy of promoting market competition, and (iv) any other factors bearing on the public interest as

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<sup>21</sup> 15 U.S.C. § 717b(a) (emphasis added).

<sup>22</sup> *Id.*

<sup>23</sup> *See, e.g., Sierra Club v. DOE*, 134 F.4th 568, 572-73 (D.C. Cir. 2025) (noting Congress framed the “public interest” standard in Section 3(a) “in terms of a presumption favoring export applications”); *Sierra Club v. DOE*, 867 F.3d 189, 203 (D.C. Cir. 2017) (construing Section 3(a) as containing a general presumption favoring export authorization, and requiring an affirmative showing of inconsistency with the public interest for denial of an application).



determined by DOE.<sup>24</sup> Historically, to further support these considerations, DOE has undertaken analysis of the impacts of exports in detailed formal studies, the most recent of which was the 2024 LNG Export Study.<sup>25</sup> In summarizing the information from the 2024 LNG Export Study, comments received in response to the study and materials submitted therewith, DOE has highlighted nine “Key Findings”:

1. *U.S. domestic natural gas supply is sufficient to meet domestic and market-based global demand for U.S. natural gas (including LNG).*
2. *Increasing U.S. LNG exports increases U.S. [gross domestic product (“GDP”)].*
3. *Higher levels of U.S. LNG exports will have a beneficial impact on the U.S. trade balance.*
4. *Increased LNG exports are projected to have relatively modest impacts on prices and there has not been a consistent effect of U.S. LNG exports on prices to date. The potential price impacts from increased LNG exports modeled in the 2024 [LNG Export] Study are within the range of prices observed over the past five years, and those price impacts are below the price increases from U.S. LNG exports modeled in DOE’s 2018 LNG Export Study.*
5. *Increased U.S. LNG exports would enhance national and energy security for the United States, as well as U.S. allies and trading partners.*
6. *If U.S. LNG exports more than triple from current levels and reach the model-resolved level of exports, 56.3 Bcf/d, the cumulative increase in global [greenhouse gas (“GHG”)] emissions to 2050 would be no greater than 0.1%. Given the uncertainties inherent in modeling the global energy system, DOE cannot conclude that the change in GHG emissions would be significantly different from zero.*
7. *Increased U.S. exports of LNG are more likely to displace other sources of natural gas, along with coal and oil, than to replace renewable energy.*

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<sup>24</sup> See, e.g., Order No. 4492, at 22.

<sup>25</sup> U.S. Dep’t of Energy, Office of Fossil Energy & Carbon Management, Energy, Economic, & Environmental Assessment of U.S. LNG Exports (Dec. 2024) (hereinafter, the “2024 LNG Export Study”).

8. *Natural gas production and the development of natural gas export infrastructure provide economic support to the communities in which they occur, including increased levels of employment.*
9. *Natural gas production, processing, and transportation have environmental effects. Federal, state, and local regulatory requirements that are outside DOE's authority over LNG exports include measures to reduce or mitigate any potential related impacts.*<sup>26</sup>

These findings should inform DOE's public interest analysis and underpin a determination that additional exports to Non-FTA Countries, as proposed herein in, are not inconsistent with the public interest.

With regard to DOE's first and second considerations, the domestic need for the natural gas to be exported and the security of domestic natural gas supplies, DOE/FECM has recently confirmed its agreement with the contention that "the United States has abundant natural gas resources available to meet both projected future domestic needs and demand" for new exports of LNG.<sup>27</sup> Similarly, in assessing the Energy Information Administration's ("EIA") Annual Energy Outlook ("AEO") 2025 to evaluate any differences from AEO 2023, which formed the basis for the 2024 LNG Export Study, DOE/FECM further noted that "EIA's projections in AEO 2025 continue to show market conditions that will accommodate increased exports of natural gas — well above what is required to meet projected increases in domestic consumption."<sup>28</sup> These conclusions are further supported by DOE's Key Finding No. 1 from its Response to Comments on the 2024 LNG Export Study, as noted above.

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<sup>26</sup> U.S. Dep't of Energy, Office of Fossil Energy & Carbon Management, Energy, Economic, and Environmental Assessment of U.S. LNG Exports: Response to Comments at 46-49 (May 19, 2025) ("*Response to Comments*").

<sup>27</sup> *Venture Global CP2 LNG, LLC*, Final Order Granting Long-Term Authorization to Export Liquefied Natural Gas to Non-Free Trade Agreement Nations, DOE/FECM Order No. 5264-A, FE Docket No. 21-131-LNG, at 48-49 (Oct. 21, 2025).

<sup>28</sup> *Id.* at 49.

With regard to promoting market competition, DOE has long held that its general policy is that “the market is the most efficient means of allocating natural gas supplies.”<sup>29</sup> Allowing more projects the ability to export domestic natural gas will facilitate market competition between LNG companies domestically, and will strengthen the competitive position of U.S. natural gas abroad. As noted in DOE’s Key Finding No. 2, additional LNG exports will have a positive impact on the U.S. GDP. Specifically, “DOE found that increasing LNG exports results in an increase to U.S. GDP in all cases examined [in the 2024 LNG Export Study], including by an estimated \$410 billion cumulatively for the period 2020 through 2050 under the Reference case.”<sup>30</sup>

Finally, with regard to other factors bearing on the public interest, DOE/FECM has evaluated a panoply of considerations, but has primarily focused on the economic impacts of additional LNG exports. In this regard, DOE/FECM has come to a number of conclusions, most of which are incorporated in Key Finding Nos. 2, 3, 4 and 8, as detailed above. DOE/FECM has already concluded that additional LNG exports will result in a positive impact on the local and national economies through new jobs and tax revenues, and will improve the U.S. balance of trade.<sup>31</sup> With regard to price impacts, DOE/FECM’s latest data and conclusions continue to be consistent with the finding in Order No. 4492 that concerns regarding “domestic price increases are not supported by the record evidence.”<sup>32</sup> DOE has also considered the impact of proposed additional exports on global energy security, and has found that, consistent with Key Finding No. 5, “[a]n efficient, transparent international market for natural gas with diverse sources of supply provides both economic and strategic benefits to the United States and our allies” and “to the extent

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<sup>29</sup> *Commonwealth LNG, LLC*, Final Order Granting Long-Term Authorization to Export Liquefied Natural Gas to Non-Free Trade Agreement Nations, DOE/FECM Order No. 5238-A, FE Docket No. 19-134-LNG, at 41-42 (Aug. 29, 2025) (“*Order No. 5238-A*”).

<sup>30</sup> *Id.* at 30.

<sup>31</sup> *See id.* at 30 n.181.

<sup>32</sup> *Order No. 4492*, at 42.

U.S. exports diversify global LNG supplies and increase the volumes of destination-flexible LNG available globally, these exports will improve energy security for many U.S. allies and trading partners.”<sup>33</sup>

In light of the foregoing, the RGLNG Entities assert that the proposed exports contemplated in the instant Application are not inconsistent with the public interest.

## **VIII. ENVIRONMENTAL CONSIDERATIONS**

DOE’s procedures under the National Environmental Policy Act<sup>34</sup> provide for a categorical exclusion, alleviating DOE from preparing either an environmental impact statement or an environmental assessment for exports of LNG and associated transportation by marine vessel. As DOE/FECM has noted, in establishing the exclusion, the “potential environmental effects associated with marine transport, the only reasonably foreseeable environmental impacts associated with DOE natural gas export authorizations, are minimal.”<sup>35</sup> In this regard, marine transport effects are the only reasonably foreseeable environmental impacts from the exports proposed in the instant Application and DOE should issue a categorical exclusion in connection with its review hereof.

## **IX. APPENDICES**

The following appendices are attached hereto and incorporated by reference herein:

Appendix A: Verification  
Appendix B: Opinion of Counsel

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<sup>33</sup> *Order No. 5238-A*, at 37.

<sup>34</sup> 42 U.S.C. §§ 4321 *et seq.*

<sup>35</sup> *See* U.S. Dep’t of Energy, National Environmental Policy Act Implementing Procedures; Final Rule, 85 Fed. Reg. 78,197, 78,199 (Dec. 4, 2020).

**X.**  
**CONCLUSION**

For the reasons discussed above, the RGLNG Entities respectfully request that DOE/FECM grant the authorizations sought herein by September 17, 2026.

Respectfully submitted,

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General Counsel and Corporate Secretary  
NextDecade Corporation  
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Dated: December 17, 2025

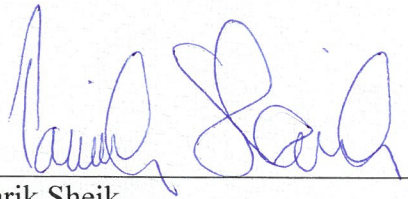
## **Appendix A**

**VERIFICATION**

State of Texas )

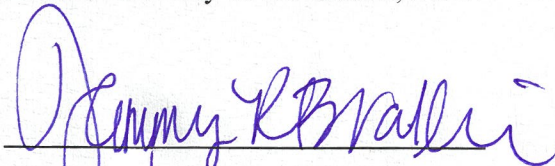
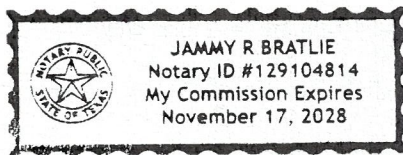
County of Harris )

BEFORE ME, the undersigned authority, on this day personally appeared Tarik Sheik, who, having been by me first duly sworn, on oath says that he is the Chief Operating Officer for NextDecade Corporation and is duly authorized to make this Verification; that he has read the foregoing instrument and that the facts therein stated are true and correct to the best of his knowledge, information and belief.



Tarik Sheik  
Chief Operating Officer

SWORN TO AND SUBSCRIBED before me on the 17th day of December, 2025.

  
Name: Jammy Bratlle

Title: Notary Public

My Commission expires: November 17, 2028

## **Appendix B**



December 17, 2025

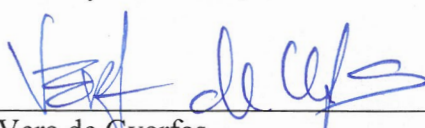
U.S. Department of Energy  
Office of Fossil Energy and Carbon Management, FE-34  
1000 Independence Avenue, SW  
Washington, D.C. 20585

**RE: Rio Grande LNG, LLC,  
Rio Grande LNG Train 4, LLC, and  
Rio Grande LNG Train 5, LLC  
FE Docket No. 15-190-LNG  
Application for Limited Amendment to Authorizations to Export Liquefied Natural  
Gas to Free Trade and Non-Free Trade Agreement Countries**

Dear Sir or Madam:

This opinion of counsel is provided in accordance with the requirements of section 590.202(c) of the U.S. Department of Energy's regulations, 10 C.F.R. § 590.202(c) (2024). I have examined the organizational and internal governance documents of Rio Grande LNG, LLC, Rio Grande LNG Train 4, LLC, and Rio Grande LNG Train 5, LLC (collectively, "RGLNG Entities") and other authorities as necessary and have concluded that the proposed exportation of liquefied natural gas is within the RGLNG Entities' company powers.

Respectfully submitted,

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By: Vera de Gyarfas  
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