



## **Docket No. 15-190-LNG – Change in Control: Rio Grande LNG Entities**

### **Sworn Analytic Statement under the APA, PRA, Fairness, and OMB A-4**

**Docket:** 15-190-LNG | **Agency/Office:** Department of Energy – Office of Fossil Energy & Carbon Management | **Subject:** Change in control – Rio Grande LNG, LLC; Rio Grande LNG Train 4, LLC; and Rio Grande LNG Train 5, LLC.

**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)**

The Office of Fossil Energy and Carbon Management has published a notice that the Rio Grande Entities filed a Statement and Notice of Change in Control describing a change in the upstream ownership of Rio Grande LNG Train 4. This sworn comment provides administrative-record evidence that the proposed transaction—where interests in Train 4 are shifting among GIP V Velocity, Global LNG North America Corp. and NextDecade LNG, according to the notice’s Supplement—carries interagency implications. It explains how modernising verification systems and reducing administrative friction can protect employment and energy-security outcomes during such ownership transitions.

### **2. Standing and Evidence-Building Authority**

Obelisk Tech Systems Inc. has established a track record of supplying sworn analytic statements and technical evidence to federal agencies. We have developed verification frameworks and resilient-infrastructure technologies that align with federal evidence standards and can reduce paperwork burden. As an American company headquartered in Thomasville, Georgia, with leadership experienced in federal filings, we are qualified to provide competent and material evidence regarding this change in control and its broader implications.

### **3. Administrative Energy & Oversight Flywheel (Record-Impact Mechanism)**

The filing of this comment triggers a self-reinforcing oversight cycle: (1) evidence enters the docket; (2) agency recognition increases credibility; (3) validated evidence supports procurement and oversight funding; and (4) subsequent filings amplify cross-agency reach. The Rio Grande LNG change in control involves foreign ownership interests and may require review by the Committee on Foreign Investment in the United States (CFIUS). This underscores the need for coordinated oversight and the amplification effects of sworn analytic submissions.

#### 4. Cross-Agency and Statutory Relevance

This evidence intersects several statutory lanes:

- **APA § 553(c)** consultation and § 706 review standards.
- **PRA** burden accounting and renewal/materiality review.
- **E.O. 12866** interagency circulation and OIRA coordination.
- **OMB A-4/A-11** evidence standards and performance reporting.
- **CFIUS** review under 50 U.S.C. § 4565 when foreign entities acquire interests in critical infrastructure.
- **E.O. 14110** (Trustworthy AI) and cyber-resilience requirements relevant to LNG control systems.

#### 5. Employment & Human-Impact Narrative

The LNG sector supports thousands of direct and indirect jobs in Gulf Coast communities. As illustrated by the South Georgia timber collapse—with over **1,600** direct jobs lost—delays or uncertainty in infrastructure projects can trigger cascading layoffs. In the Rio Grande case, timely approval and transparent oversight are crucial to maintain investor confidence, keep construction crews employed and ensure that supply-chain partners continue investing. Federal regulators must recognise these human impacts when assessing change-in-control filings.

#### 6. Patent / Portfolio / Sole-Source Relevance

Obelisk's patent suite enables DOE to **condition CIC approvals with domestic verification capability**, including:

##### **Referenced Patent Suite (titles + USPTO identifiers):**

Patents all 11

1. Adaptive Multimodal Security Fusion & Chain-of-Custody System — **63/881,268**
2. Section 508 Continuous Remediation Proof Ledger (508-CRP) — **63/881,269**
3. Adaptive Thermal Lithography Optimization via ML Feedback — **63/909,857**
4. AI-Driven Mineral Field Detection & Strategic Supply-Chain Mapping — **63/909,860**
5. Consumer Credit Integrity Scoring via Federated AI/Blockchain — **63/909,862**
6. Federated Learning Data Isolation for Mobile Defense Devices — **63/909,864**
7. Autonomous Lithography Alignment for Sub-Micron Wafers — **63/909,870**
8. **CryptexQ Quantum-Resilient FPGA Encryption** — **63/909,875**  
patentsecureencrption
9. **Satellite-Based AI Imaging Relay (Vigilant Orbit)** — **63/909,876**  
patentsatellitebasedAI
10. Precision Thermal Lithography Apparatus (HelioFab) — linked to **63/909,857**
11. Multi-Band Antenna Array for Satellite/Ground AI Sync — linked to **63/909,876**

These patents collectively enable **trusted domestic AI + secure infrastructure operations** across energy export facilities.

- **Port-wide AI berth/crane scheduling (PAISE)** for terminal throughput resilience.  
Port Wide Artificial
- **CryptexQ quantum-resilient FPGA encryption** for OT/edge devices and plant telemetry chain-of-custody.
- **Federated AI data isolation for defense-grade mobile/field devices**, relevant to perimeter and contractor access systems.
- **Semiconductor-process AI control patents** ensuring trustworthy compute underpinning export infrastructure.

Failure to modernise oversight for this transaction could lead to:

- Continued duplicative compliance and delays, inflating costs and jeopardising project timelines.
- Increased fraud or mismatch risk in export-licence and ownership records.
- Erosion of domestic supplier competitiveness and associated job losses.
- Additional burdens on OIRA, GAO, IGs and Congressional oversight.

Given the foreign economic interests described in the notice and the potential requirement for CFIUS approval, prompt, coordinated action is essential.

## **Economic & Workforce Impact**

Foreign-capital CIC approvals that are not paired with **domestic AI/cyber verification** raise the risk of:

- port slowdowns,
- OT incidents,
- construction/operations job volatility, and
- strategic loss of domestic industrial capacity.  
DOE should treat **verification tech adoption** as a jobs-and-resilience multiplier (OMB A-4 materiality).

## **Strategic Risk of Non-Adoption**

If DOE default-approves CIC changes without **mandated cyber + AI + supply-chain validation layers**, the U.S. amplifies known risk vectors:

- port cyber vulnerabilities,
- adversarial dependency in compute and minerals,
- audit gaps that GAO continues to flag across infrastructure sectors.

## 7. Interagency Coordination & Notification Request

Please circulate this evidence under E.O. 12866 § 6(b)(1) and PRA/FRA routing to:

- OIRA
- DOE Office of Fossil Energy & Carbon Management (lead docket office)
- Department of the Treasury (CFIUS)
- Department of Commerce, Department of Transportation and Department of Homeland Security
- GAO and relevant Inspectors General
- NIST/FedRAMP PMO for any cyber-control system standards

## 8. Administrative Determination Requested

I request that the agency and OIRA determine that this sworn analytic record is material under OMB A-4 and APA § 706(2)(A), that it must be preserved and indexed in the docket, that the employment and regional-industry effects are within scope of the rule's cost-benefit and PRA analysis, and that it be circulated for cross-agency review.

## SBIR / STTR Contact & Engagement Request (Personal, Material, and On-Record)

I am requesting that DOE/FECM **place Obelisk Tech Systems Inc. and myself on the short list for direct SBIR/STTR outreach** connected to LNG export reliability, maritime/port AI resilience, and OT cybersecurity.

- I am the **sole inventor/assignee** on multiple relevant filings, including a **port-wide AI berth/crane scheduling system** that directly addresses LNG terminal congestion and demurrage drivers.
- I maintain a **domestic-only, founder-controlled deployment model** designed to meet federal integrity and CUI standards.  
OBELISK TECH SYSTEMS INC Offici...
- My portfolio is already structured for rapid Tier-2/Reg-A scale and federal co-development, making it **SBIR-ready** at speed.

- I am available for immediate technical briefing, white-paper expansion, and pilot scoping.

## **SBIR / STTR Short-List Request**

I respectfully request **direct DOE SBIR/STTR contact** on:

1. **Port / LNG terminal AI optimization pilots,**
2. **OT cybersecurity / chain-of-custody verification pilots,**
3. **Domestic hardware-integrity validation tied to LNG export reliability.**

My portfolio is already filed, scoped, and aligned with federal evidence standards, and I am prepared to brief program managers immediately.

## **Interagency Routing**

Request DOE route this docket for shared review with OIRA, DHS maritime cyber, DOD industrial base, and GAO.

## **9. Signature Block and Sworn Declaration**

I, **James Hunter Poole**, declare under penalty of perjury pursuant to 28 U.S.C. § 1746, and consistent with 5 U.S.C. § 553(c), 44 U.S.C. § 3511(b), OMB Circulars A-4/A-11 and applicable Executive Orders, that the information herein is true and correct to the best of my knowledge and belief. Executed this **30th day of November 2025**.

Signature:  11/30/2025

James Hunter Poole  
Executive Chairman & Chief Executive Officer  
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