

**RECEIVED**

**By Docket Room at 2:12 pm, Dec 16, 2025**

555 Eleventh Street, N.W., Suite 1000  
Washington, D.C. 20004-1304  
Tel: +1.202.637.2200 Fax: +1.202.637.2201  
www.lw.com

## LATHAM & WATKINS LLP

December 16, 2025

### **By Electronic Mail**

Ms. Amy Sweeney  
U.S. Department of Energy  
Office of Fossil Energy and Carbon Management  
Office of Regulation, Analysis, and Engagement  
1000 Independence Ave., S.W.  
Washington, D.C. 20585  
[fergas@hq.doe.gov](mailto:fergas@hq.doe.gov)

#### FIRM / AFFILIATE OFFICES

Austin	Milan
Beijing	Munich
Boston	New York
Brussels	Orange County
Chicago	Paris
Dubai	Riyadh
Düsseldorf	San Diego
Frankfurt	San Francisco
Hamburg	Seoul
Hong Kong	Silicon Valley
Houston	Singapore
London	Tel Aviv
Los Angeles	Tokyo
Madrid	Washington, D.C.

Attention: Venture Global CP2 LNG, LLC  
FE Docket No. 21-131-LNG  
**PRIVILEGED AND CONFIDENTIAL** Submission of Contract  
and Summary of Major Provisions of Contract for Public Posting

Dear Ms. Sweeney:

Venture Global CP2 LNG, LLC (“CP2 LNG”) was granted long-term, multi-contract authority to export liquefied natural gas (“LNG”) to (1) nations with which the United States has not entered into a Free Trade Agreement (“FTA”) requiring the national treatment of natural gas in Order No. 5264-A issued in FE Docket No. 21-131-LNG on October 21, 2025, and (2) FTA nations in Order No. 4812 in the same docket on April 22, 2022. Ordering Paragraph F(ii) of Order No. 5264-A and Ordering Paragraph (D)(ii) of Order No. 4812 require CP2 LNG to file a non-redacted copy of all executed long-term contracts associated with the long-term supply of natural gas to its Project within thirty days of contract execution. If a contract is filed under seal and subject to a claim of confidentiality or privilege, CP2 LNG also must file for public posting a summary of the non-proprietary, major provisions of the contract.

On November 24, 2025, CP2 LNG entered into a Transaction Confirmation with Apex Natural Gas, LLC (“Apex”) pursuant to a previously executed Base Contract for Sale and Purchase of Natural Gas under which CP2 LNG will purchase natural gas on a long-term basis from Apex.

This natural gas supply contract is highly confidential and contains commercially valuable and proprietary information, the disclosure of which would cause competitive and financial harm to the parties to the contract. Accordingly, consistent with the requirements of its export authorizations, CP2 LNG submits here a summary, for public posting, of the major, non-

LATHAM & WATKINS<sup>LLP</sup>

proprietary provisions of the supply contract. The summary utilizes the template previously followed by CP2 LNG and other LNG export projects when filing long-term gas supply contracts.

In addition, CP2 LNG is also transmitting – in a confidential, separate transmission directed solely to the addressee – the full and unredacted copies of the executed Base Contract and the Transaction Confirmation with Apex. CP2 LNG respectfully requests that the contracts be treated and maintained as confidential to the greatest extent permitted by law.

If you have any questions about this filing or related matters, please contact the undersigned counsel for CP2 LNG.

Sincerely,

/s/ J. Patrick Nevins

J. Patrick Nevins

Latham & Watkins LLP

[Patrick.Nevins@LW.com](mailto:Patrick.Nevins@LW.com)

(202) 637-3363

**BASE CONTRACT AND TRANSACTION CONFIRMATION  
BETWEEN APEX NATURAL GAS, LLC  
AND VENTURE GLOBAL CP2 LNG, LLC**

**1. DOE Order / FE Docket Nos.:**

DOE Order Nos. 4812 and 5264-A  
FE Docket No. 21-131-LNG

**2. Exact Legal Name of Parties/ Counterparties to Contract:**

Seller: Apex Natural Gas, LLC  
Buyer: Venture Global CP2 LNG, LLC<sup>1</sup>

**3. Contract Type:**

NAESB Base Contract for Sale and Purchase of Natural Gas and  
Transaction Confirmation

**4. Date of Contract Execution:**

November 24, 2025 (Transaction Confirmation)

**5. Supply Period**

Five years

**6. Annual Contract Quantity**

The annual contract quantity is: (a) 36,500,000 MMBtu/year for each of the first three years of the supply period; and (b) 18,250,000 MMBtu/year for each of the final two years of the supply period.

**7. Take or Pay Provisions:**

Not Applicable

---

<sup>1</sup> There is no corporate affiliation between Apex Natural Gas, LLC and Venture Global CP2 LNG, LLC.