

RECEIVED

By Docket Room at 3:52 pm, Jan 15, 2026

Phone: (202) 420-2656
Fax: (202) 379-9027
Email: brett.snyder@blankrome.com

January 15, 2026

VIA EMAIL (FERGAS@HQ.DOE.GOV)

Amy Sweeney
Director, Office of Regulation, Analysis and Engagement (FE-34)
Office of Resource Sustainability
Office of Fossil Energy and Carbon Management
1000 Independence Ave., S.W.
Washington, DC 20585

Re: *ECA Liquefaction, S. de R.L. de C.V.*,
FE Docket No. 18-144-LNG (ECA Mid-Scale Project)
Long-Term Contract Summary – Sale and Purchase Agreement

Dear Ms. Sweeney:

ECA Liquefaction, S. de R.L. de C.V. (“ECA Liquefaction”) has received from the Department of Energy Office of Fossil Energy and Carbon Management (“DOE/FECM”): (1) long-term, multi-contract authorization to export liquefied natural gas (“LNG”) to nations with whom the United States has entered into a Free Trade Agreement requiring the national treatment for trade in natural gas, *see* DOE/FECM Order Nos. 4317, 4317-A, and 4317-B in FE Docket No. 18-144-LNG; and (2) long-term, multi-contract authorization to export LNG to nations with whom the United States has not entered into a Free Trade Agreement requiring the national treatment for trade in natural gas, *see* DOE/FE Order Nos. 4364, 4364-A, and 4364-B in FE Docket No. 18-144-LNG (collectively, “Export Authorizations”).¹

¹ *See Energía Costa Azul, S. de R.L. de C.V.*, DOE/FE Order No. 4317, FE Docket No. 18-144-LNG, Order Granting Long-Term, Multi-Contract Authorization to Export Natural Gas to Mexico and to Other Free Trade Agreement Nations (Jan. 25, 2019); *Energía Costa Azul, S. de R.L. de C.V.*, DOE/FE Order No. 4364, FE Docket No. 18-144-LNG, Opinion and Order Granting Long-Term Authorization to Re-Export U.S.-Sourced Natural Gas in the Form of Liquefied Natural Gas from Mexico to Non-Free Trade Agreement Countries (Mar. 29, 2019). The Export Authorizations were initially issued to Energía Costa Azul, S. de R.L. de C.V. (“ECA”). On August 15, 2019, ECA and ECA Liquefaction filed an application with DOE to transfer the Export Authorizations to ECA Liquefaction. *See* Application to Transfer Long-Term, Multi-Contract Authorizations to Export Natural Gas to Mexico and to Export Liquefied Natural Gas from Mexico to Free Trade Agreement and Non-Free Trade Agreement Nations, FE Docket No. 18-144-LNG (Aug. 15, 2019). On October 7, 2019, DOE/FE granted the requested transfer of the authorizations. *See* DOE/FE Order Nos. 4317-A & 4364-A, FE Docket No. 18-144-LNG, Order Granting Request to Transfer Authorizations (Oct. 7, 2019).

BLANKROME

Amy Sweeney
January 15, 2026
Page 2

Pursuant to the long-term contract filing requirements of the Export Authorizations,² ECA Liquefaction submits herewith for filing a public summary of the following long-term LNG sale and purchase agreement executed with SI LNG Optimization Services, LLC:

- LNG Sale and Purchase Agreement (FOB), dated November 15, 2022.

ECA Liquefaction is separately filing an unredacted copy of the agreement with DOE/FECM under seal.

ECA Liquefaction makes this filing without waiver of the position taken by Sempra LNG & Midstream, LLC in the proceedings regarding the Proposed Interpretative Rule in *Filing of Contracts and Purchase Agreement Associated with the Export of Natural Gas*, 83 Fed. Reg. 65111 (Dec. 19, 2018), which remains pending.³

Please contact the undersigned with any questions regarding this submission.

Respectfully submitted,

/s/ Brett A. Snyder

Brett A. Snyder
Counsel for ECA Liquefaction, S. de R.L. de C.V.

BAS:esc
Enclosures

² See DOE/FE Order No. 4317 at Ordering Para. (D); DOE/FE Order No. 4364 at Ordering Para. (H); see also *Filing of Contracts and Purchase Agreements Associated with the Export of Natural Gas*, 83 Fed. Reg. 65111 (Dec. 19, 2018).

³ See Comments of Sempra LNG & Midstream, LLC, Natural Gas Contract Guidance, *Filing of Contracts and Purchase Agreements Associated with the Export of Natural Gas* (Jan. 18, 2019).

**LONG TERM CONTRACT – LNG SALE AND PURCHASE AGREEMENT (FOB)
MAJOR PROVISIONS SUMMARY**

1. ***DOE/FECM Order No(s):*** DOE/FECM Order Nos. 4317, 4317-A, 4317-B, 4364, 4364-A, 4364-B

DOE/FECM Docket No(s): Docket No. 18-144-LNG

2. ***LNG Liquefaction/Export Facility and Location:***

ECA Liquefaction Facility located north of the city of Ensenada, Baja California, Mexico.

3. ***Describe affiliation with LNG Liquefaction Export Facility (e. g., owner, capacity holder, etc.):***

The contract has been entered into by the owner of the ECA Liquefaction Facility located north of the city of Ensenada, Baja California, Mexico.

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

SI LNG Optimization Services, LLC (“Buyer”)

ECA Liquefaction, S. de R.L. de C.V. (“Seller”)

5. ***Contract Type (e.g., Purchase and Sale Agreement; Liquefaction Tolling Agreement, etc.):***

LNG Sale and Purchase Agreement (FOB)

6. ***Date of the Contract:***

November 15, 2022

7. ***Contract Term:***

20 years.

8. ***Quantity (Annual and Total, if appropriate, include +/-% flexibility):***

10,400,000 MMBtu/year, as reduced during the first and last year of the term if not full calendar years.

9. *Take or Pay (or equivalent) Provisions/Conditions (please describe):*

The agreement provides that Buyer shall take and pay for, or compensate Seller in accordance with the agreement if not taken, such LNG, in the quantities and at the prices set forth in and otherwise in accordance with and subject to the provisions of the agreement.

10. *Supplier (title holder) of Natural Gas to Liquefaction Facility (include whether long or short-term supply, or both), if appropriate. If this does not include the Purchase or Sale of Natural Gas, please mark this Section “Not Applicable”:*

Not Applicable

11. *Legal Name of Entity(ies) that has(have) Title of the Natural Gas and LNG through the LNG Facility until Export (at the Flange of the Vessel):*

ECA Liquefaction, S. de R.L. de C.V.

12. *Export Destination Restrictions in the Contract:*

The contract restricts exports of LNG received by the Buyer from the Seller to destination countries permitted under (i) the applicable DOE/FECM export authorizations and (ii) U.S. law.

13. *Resale Provisions:*

Buyer acknowledges and agrees that it will resell or transfer LNG purchased under the agreement for delivery only to the countries identified in the relevant DOE/FECM export authorizations and/or to purchasers that have agreed in writing to limit their direct or indirect resale of such LNG to such countries.

14. *Other Major Non-proprietary Provisions, if Applicable:*

None.

I affirm that the foregoing is true and accurate to the best of my knowledge.

DATED: January 15, 2026

SUBMITTED BY:

/s/ Jerrod L. Harrison

Jerrod L. Harrison

ECA Liquefaction, S. de R.L. de C.V.