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By Docket Room at 4:18 pm, Feb 23, 2026



February 23, 2026

Submitted Electronically

RE: Importation or Exportation of Liquefied Natural Gas or Electric Energy; Applications, Authorizations, etc.: ST LNG, LLC

To Whom It May Concern:

Turtle Island Restoration Network (TIRN) is an active 501(c)3 non-profit organization whose mission is to mobilize people in local communities around the world to protect marine wildlife and the oceans and inland watersheds that sustain them. TIRN has remained a leading force in the protection and recovery of endangered and threatened species, driven by a long-standing commitment to preserving a healthy, blue-green planet for future generations. As an environmental non-profit organization with over three decades of experience, TIRN engages in science-based advocacy, habitat restoration, legal action, and public education to safeguard marine wildlife and their ecosystems. TIRN's work focuses on species like sea turtles, sharks, and whales, many of which are directly affected by the commercial fishing industry. Through hands-on conservation, policy, grassroots advocacy, and litigation, TIRN works to ensure vulnerable species have a voice.

ST LNG, LLC plans to build and operate a large liquefied natural gas (LNG) export facility about 10.4 nautical miles offshore from Matagorda, Texas. The proposed deepwater port would include fixed and floating structures, such as platforms, mooring dolphins, and converted LNG carriers, with a planned export capacity of up to 8.4 million tonnes per year. The proposed ST LNG deepwater port would consist of four platforms dedicated to LNG liquefaction and export, connected via pipelines to an onshore hub. The facility includes four gas treatment platforms, four liquefaction platforms, four accommodation and utility platforms, and four LNG transfer platforms. The project features five new pipelines: a 5.5-mile, 30-inch lateral pipeline with a connection hub and four feeder lines connecting to that hub. The docking and export infrastructure comprises thirty-six mooring dolphins, four converted LNG carriers, and three tugboats. The facility's export capacity is equivalent to 1.12 billion cubic feet per day (bcf/d) or 409.08 billion cubic feet per year, similar to Commonwealth LNG and Magnolia LNG, and about

half the capacity of Freeport LNG, which exports 2.38 bcf/d. The associated greenhouse gas emissions are estimated at 7 million tonnes per year.

TIRN urges the Department of Energy (DOE) to deny the application from ST LNG for long-term, multi-contract authorization to export domestically produced liquefied natural gas (LNG) in a volume equivalent to approximately 460 billion cubic feet (Bcf) of natural gas per year (Bcf/yr).

The proposed facility would have the capacity to become a major new source of greenhouse gas emissions by exporting up to 8.4 million tonnes per annum (MTPA) of LNG. According to available estimates, the project would emit around 7 million metric tonnes of CO₂ equivalent per year. This is a large amount that ultimately undermines U.S. commitments to combat climate change and transition to a clean energy economy. Approving a fossil fuel project of this magnitude at this moment in history is against both climate science and public policy objectives aimed at reducing emissions and protecting future generations.

Beyond its climate impact, the project would pose significant risks to marine ecosystems and the health and safety of nearby communities. The construction and operation of the deepwater port would include thirty-six mooring dolphins, four converted LNG carriers, and multiple platforms for gas treatment, liquefaction, accommodation, and transfer. This infrastructure could disrupt critical marine habitats, including areas used by fish, sea turtles, and marine mammals, and increase the likelihood of accidents, spills, and other ecological damage. The increased industrial vessel traffic could also degrade water quality, endanger local fisheries and tourism-based economies, and increase the risk of vessel strike injuries for marine mammals and sea turtles.

In addition, the onshore infrastructure, including five new pipelines, including a 5.5-mile, 30-inch lateral pipeline, could have serious implications for land use, air and water quality, and the health of frontline communities, many of which are already overburdened by existing industrial operations. These impacts deserve thorough, independent review and should be considered in light of environmental justice concerns.

The Gulf of Mexico has been disproportionately impacted by fossil fuel development for decades. Risks of oil spills are inevitable. The 2010 Deepwater Horizon disaster serves as a horrific reminder of the risks: total damages to BP, the environment, and the Gulf Coast economy were estimated to be \$36.9 billion as of 2011,¹ extensive marine life injury and mortality (including marine mammals),² long-term contamination, and severe public health consequences

¹ Smith, L. C., Smith, L. M., & Ashcroft, P. A. (2011). Analysis of environmental and economic damages from British Petroleum's Deepwater Horizon oil spill. *Albany Law Review*, 74(1).

² Takeshita, R., Sullivan, L., Smith, C., Collier, T., Hall, A., Brosnan, T., ... & Schwacke, L. (2017). The Deepwater Horizon oil spill marine mammal injury assessment. *Endangered Species Research*, 33, 95-106.

for coastal residents. In 2025, frontline communities continued to suffer from environmental pollution associated with existing oil and gas projects.³ Additionally, endangered marine species, like the Rice's whale and Kemp's Ridley Sea Turtle, face increased risk of death or injury due to habitat destruction, vessel strikes, and noise pollution associated with oil and gas development.⁴ We are seeing a record number of Kemp's Ridley nests along the Texas coast this year, with a nest even being found on the Matagorda Peninsula.⁵ Nesting sea turtles and hatchlings will be at significant risk in this area as a result of this project. This area is also ecologically important for migrating sea turtles. Any sort of disruption threatens to impact already struggling populations. With less than 50 Rice's whales remaining, this species is on the brink of extinction, with threats related to oil and gas development cited as a leading cause of mortality.

Frontline communities in the Gulf of Mexico have suffered from decades of environmental and health issues caused by oil and gas development. These communities, already experiencing the harmful impacts of the climate crisis caused by fossil fuel emissions, suffer from higher rates of asthma, respiratory illness, and cancer. This is a direct result of decades of federal approvals for fossil fuel and industrial facilities along the Gulf of Mexico.⁶ In Southern Louisiana, a polluted industrial corridor, commonly referred to as Cancer Alley, is home to 25% of the country's petrochemical production. Spanning only eighty-five miles, the overall population in Cancer Alley is 40% Black, but many communities in the corridor are over 90% Black, a legacy of the region's post-slavery reconstruction. Air and water quality are often compromised as a result of oil and gas operations, further impacting frontline communities, as well as the environment.⁷

ST LNG's proposed export volume is equivalent to other projects like Commonwealth LNG and Magnolia LNG and nearly half the capacity of Freeport LNG, making it a significant expansion of LNG export infrastructure. Continuing to build out large fossil fuel infrastructure not only locks in decades of future emissions, but also delays the necessary investments in renewable energy and sustainable economic alternatives. In a region already overburdened by fossil fuel development, we must not allow these frontline communities and the environment to be sacrificed for short-term industry profits.

Additionally, ST LNG requests the authorization for a term to commence on the date of first export following the commencement of commercial operation of the project. ST LNG also

³ CBS News. (2025, May 2). Oil spill off Louisiana's Gulf Coast raises alarm as DOGE cuts may threaten response efforts. CBS News. <https://www.cbsnews.com/news/oil-spill-louisiana-gulf-coast-doge-cuts/>

⁴ National Oceanic and Atmospheric Administration. (n.d.). Kemp's ridley turtle (*Lepidochelys kempii*). NOAA Fisheries. Retrieved from <https://www.fisheries.noaa.gov/species/kemps-ridley-turtle>

⁵ Turtle Island Restoration Network. (2024, May 28). Daily sea turtle nest counts on the Texas coast. Turtle Island Restoration Network. Retrieved August 1, 2025, from <https://seaturtles.org/turtle-count-texas-coast/>

⁶ Saha, R. K., Bullard, R. D., & Powers, L. T. (2024). Liquefying the Gulf Coast: A Cumulative Impact Assessment of LNG Buildout in Louisiana and Texas.

⁷ McCoy, B. C. (2021). Critical Infrastructure, Environmental Racism, and Protest: A Case Study in Cancer Alley, Louisiana. *Colum. Hum. Rts. L. Rev.*, 53, 582.

requests to extend through December 31, 2050, plus a three-year Make-Up Period extending through December 31, 2053. It is incredibly reckless to consider a project that is proven to negatively impact the environment and public health for such a long duration.

TIRN strongly urges the Department of Energy (DOE) to deny the application from ST LNG for long-term, multi-contract authorization to export domestically produced liquefied natural gas (LNG) in a volume equivalent to approximately 460 billion cubic feet (Bcf) of natural gas per year (Bcf/yr). The public interest is best served by protecting our climate, our ecosystems, and our communities, not by ensuring a toxic legacy by permitting yet another massive fossil fuel export facility in the Gulf of Mexico.

Thank you for your consideration,

A handwritten signature in black ink that reads "Elizabeth Purcell". The signature is written in a cursive, flowing style.

Elizabeth Purcell
Environmental Policy Coordinator