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Stanley Silver

Stanley Silver Attorney At Law

120 N. Maclay Ave Suite F

San Fernando, CA 91340

Telephone:818.361.0171; Fax:818.361.6850

Email: stanley@stanleysilveresq.com

January 31, 2026

By Email:

FERGAS fergas@hq.doe.gov

jennifer.wade@hq.doe.gov

Ms. Jennifer Wade

Hydrocarbons and Geothermal Energy Office (HGEO)

U.S. Department of Energy

1000 Independence Avenue Southwest

Forrestal Building, Docket Room 3F-056, FE-50

Washington, DC 20585

RE: Our Client: TEXAWATT, INC. DBA TEXAS TEA FUELS & LUBES

Dear Ms. Wade:

Included herewith for filing is our client's Application of TEXAWATT, INC. DBA TEXAS TEA FUELS & LUBES for Long-Term and Short-Term Authorization to make Small Scale Exports of Liquefied Natural Gas to Free Trade Agreement and Non-Free Trade Agreement Countries. The \$50.00 filing fee was paid via Pay.gov, Tracking ID 27USCJEA; Agency Tracking ID 77272372577.

The attached includes reference in the Conclusion at page 5 to all three ports, Port Everglades, Florida, the Port of Miami, Florida and/or the Port of Galveston, Texas.

Again, thank you very much for your prompt, efficient and courteous assistance.

Best regards,

Stanley Silver Attorney At Law

/Stanley Silver/

Stanley Silver Attorney At Law

120 N. Maclay Ave Suite F

San Fernando, CA 91340

Telephone:818.361.0171

Fax:818.361.6850 Email: stanley@stanleysilveresq.com

**UNITED STATES OF AMERICA  
DEPARTMENT OF ENERGY  
HYDROCARBONS AND GEOTHERMAL ENERGY OFFICE**

**TEXAWATT, INC. DBA TEXAS TEA FUELS & LUBES) DOE/HGEO Docket No. \_\_\_\_\_**

**APPLICATION OF TEXAWATT, INC. DBA TEXAS TEA FUELS & LUBES FOR LONG-TERM AND  
SHORT- TERM AUTHORIZATION TO MAKE SMALL SCALE EXPORTS OF LIQUEFIED NATURAL  
GAS TO FREE TRADE AGREEMENT 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 (“DOE”) regulations,<sup>2</sup> TEXAWATT, INC. DBA TEXAS TEA FUELS & LUBES (“TEXAWATT”) hereby submits this Application requesting that DOE Hydrocarbons and Geothermal Energy Office (“DOE/HGEO”) issue an order granting long-term and short-term multi-contract authorization for TEXAWATT to export up to 51.75 Bcf per year of natural gas produced from domestic sources in the form of Liquefied Natural Gas (“LNG”) to (1) any country with which the United States currently has a free trade agreement requiring national treatment for trade in natural gas (“FTA countries”); and (2) any country with which the United States does not have a free trade agreement requiring national treatment for trade in natural gas with which trade is not prohibited by United States law or policy (“Non-FTA countries”).<sup>3</sup> Under the requested authorization, TEXAWATT would export LNG from Port Everglades, Florida, the Port of Miami, Florida and/or the Port of Galveston, Texas, to locations in the Caribbean, and Central America and South America via Department of Transportation-approved International Organization for Standardization (“ISO”) containers transported by barge.

Specifically, TEXAWATT requests that its long-term authorization commence on the date of first commercial export and end on December 31, 2050, consistent with DOE/HGEO’s Policy Statement extending natural gas export authorization for Non-FTA countries through December 31, 2050,<sup>4</sup> and that its long-term authorization include authority to export the same approved volume for transactions of less than two years on a non-additive basis. Such requests are consistent with DOE/HGEO’s Policy Statement that found it beneficial to consolidate both short- term and long-term authority in a single authorization to streamline its regulatory process and to reduce the administrative burdens associated with separate applications.<sup>5</sup>

As discussed herein, TEXAWATT’s application to make small-scale exports to a Non-FTA country is being filed under DOE/HGEO’s “small-scale natural gas exports” rule codified at 10 C.F.R. §§ 590.102(p) and 590.208(a), and should be deemed consistent with the public interest under Sections 3(a) and 3(c) of the NGA.

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<sup>1</sup> 15 U.S.C. § 717b.

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

<sup>3</sup> 10 C.F.R. §§ 590.102(p) and 590.208(a).

<sup>4</sup> Policy Statement Extending Natural Gas Export Authorizations to Non-Free Trade Agreement Countries Through the Year 2050, 85 Fed. Reg. 52,237 (Aug. 25, 2020).

<sup>5</sup> Policy Statement on Including Short-Term Export Authority in Long-Term Authorizations for the Export of Natural Gas on a Non-Additive Basis, 86 Fed. Reg. 2243 (Jan. 12, 2021).

Accordingly, TEXAWATT requests DOE/HGEO approve this application without modification or delay.

In support of this application, TEXAWATT respectfully states as follows:

## **I. COMMUNICATIONS**

Communications regarding TEXAWATT's application should be directed to the following:

Michael Silver  
President/CEO  
TEXAWATT, Inc.  
425 N. Lake Blvd. #7 / PO Box 1911  
Tahoe City, CA 96145  
Telephone: 530.320.6488 Email: [mike@texawattpower.com](mailto:mike@texawattpower.com)

Stanley Silver  
Stanley Silver Attorney At Law  
120 N. Maclay Ave Suite F  
San Fernando, CA 91340  
Telephone: 818.361.0171; Fax: 818.361.6850  
Email: [stanley@stanleysilveresq.com](mailto:stanley@stanleysilveresq.com)

## **II. DESCRIPTION OF THE APPLICANT**

The exact legal name of the applicant is TEXAWATT, INC. DBA TEXAS TEA FUELS & LUBES. TEXAWATT is a wholesale energy marketing company focused on the transportation of Liquid Natural Gas (LNG) and Natural Gas Liquids (NGL) via its virtual pipeline infrastructure with its principal place of business at 425 N. Lake Blvd. #7 Tahoe City, CA 96145. TEXAWATT is a California corporation and was formed for the purpose of supporting pipeline infrastructure and delivering LNG.

## **III. BACKGROUND AND EXISTING AUTHORIZATIONS**

TEXAWATT currently holds a short-term authorization to export LNG to Canada by truck from any LNG departure facility in the United States and its territories, and to export LNG to Mexico by truck from any departure facility in the United States and its territories.<sup>6</sup>

In 2026, TEXAWATT began discussions with the St. Lucia Electricity Services Limited, regarding the possibility of exporting LNG to Castries, St. Lucia. The residents of Castries, St. Lucia have historically utilized diesel-fueled generators to provide electricity to homes and businesses. These residents desire the implementation of a cleaner, more sustainable, and less expensive power source going forward. To that end, they have already installed solar generation but still must rely on diesel generators to supplement the island's power requirements. In furtherance of meeting the objectives of the residents, TEXAWATT has worked with St. Lucia Electricity Services Limited to design a solution to utilize natural gas power generators fueled with

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<sup>6</sup> HGEO Order No. 5296, Docket No. 25-61-LNG

LNG exported from the U.S. as a primary fuel source thus lowering carbon emissions significantly. TEXAWATT intends to offer similar services to other islands in the Caribbean, and countries in Central and South America.

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

TEXAWATT requests long-term and short-term multi-contract authorization to make small- scale LNG exports (up to 51.75 Bcf total annually) to FTA countries and Non-FTA countries. TEXAWATT would export domestically-produced LNG received from existing facilities within the United States.<sup>7</sup> TEXAWATT expects that these LNG suppliers will acquire natural gas from supply produced throughout the United States and delivered to the relevant facilities through the integrated natural gas pipeline grid. TEXAWATT would export these LNG volumes from Port Everglades, Florida, the Port of Miami, Florida and/or the Port of Galveston, Texas via ISO containers mounted on a chassis and transported on a barge to the Caribbean, and Central and South America. TEXAWATT would commence exporting LNG within 30 days of receiving DOE approval. The authorization requested by this application would extend through December 31, 2050.

TEXAWATT requests this authorization both on its own behalf, and when acting on behalf of other entities who themselves hold title to the LNG, after registering each such entity with DOE/HGEO in accordance with the established procedures.<sup>8</sup> TEXAWATT commits that it will comply with requirements imposed by DOE/HGEO on TEXAWATT as an exporter and agent, including filing any relevant long-term commercial agreements once they have been executed. TEXAWATT is not submitting any long-term commercial agreements because at the time of this Application, no long-term commercial arrangements have been executed. There are no other proceedings related to this application currently pending before DOE/HGEO or any other federal agency.

#### **V. STANDARD OF REVIEW**

Under NGA Section 3(c), “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>9</sup> Accordingly, TEXAWATT request to export LNG to FTA countries “shall be deemed to be consistent with the public interest,” and DOE/HGEO should grant such authorization without modification or delay.

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<sup>7</sup> See Appendix C for a list of the potential sources of LNG. TEXAWATT intends to commence serving its customers with LNG. To the extent that TEXAWATT seeks to purchase LNG from facilities that are not included on Appendix C, TEXAWATT will notify DOE/HGEO of such facilities. TEXAWATT is requesting authorization to export by LNG in order to maintain maximum flexibility to serve its customers in the most efficient way possible.

<sup>8</sup> See e.g., MKVH Advisors, DOE/HGEO Order No. 4875 at 12-13 (Sept. 23, 2022).

<sup>9</sup> 15 U.S.C. §717b(c) (2018).

Pursuant to NGA Section 3(a) and DOE/HGEO regulations, small-scale exports to Non- FTA countries are deemed to be within the public interest.<sup>10</sup> Small-scale natural gas exports are those which meet two criteria: “(1) The application proposes to export natural gas in a volume up to and including 51.75 billion cubic feet per year, and (2) DOE’s approval of the application does not require an environmental impact statement or an environmental assessment under the National Environmental Policy Act, 42 U.S.C. 4321 et seq.”<sup>11</sup> As discussed below, TEXAWATT’s proposed exports meet both of the criteria to qualify as small-scale natural gas exports and should accordingly be deemed to be within the public interest.

## **VI. PUBLIC INTEREST**

TEXAWATT’s proposed LNG exports are consistent with the public interest and merit prompt authorization. TEXAWATT’s proposed small-scale exports to Non-FTA countries are deemed in the public interest under NGA Section 3(a) pursuant to Sections 590.208(a) and 590.102(p) of DOE/HGEO’s regulations because they meet the requirement for the small-scale export authorization exemption. The proposed exports meet the size threshold given that TEXAWATT is proposing to export no more than 51.75 Bcf per year and, as discussed below, TEXAWATT’s proposed exports do not require environmental review.

While TEXAWATT’s proposed exports to Non-FTA countries technically require no further analysis because they qualify as small-scale exports, the exports are also in the public interest. As described above, the residents of Castries, St. Lucia have historically utilized diesel-fueled generators to provide electricity to homes and businesses. As part of the effort to implement a cleaner, more sustainable, and more affordable power source going forward, residents have already installed solar generation, but are still heavily reliant on diesel generators to supplement the island’s power requirements. The LNG that would be provided by TEXAWATT would help the residents of Castries, The St. Lucia shift away from diesel fuel, thereby diversifying their fuel type and reducing carbon emissions. Accordingly, the proposed small-scale LNG export volumes that would serve the immediate, ongoing needs of residents of Castries, St. Lucia are precisely the type of small- scale exports that DOE/HGEO authorized to “allow for greater diversity and competition in the natural gas market, consistent with the public interest under NGA section 3(a).”<sup>12</sup> The same is true for other islands in the Caribbean, and countries in Central and South America with which TEXAWATT may do business in the future.

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<sup>10</sup> 10 C.F.R. § 590.208(a) (“Small-scale natural gas exports are deemed to be consistent with the public interest under section 3(a) of the Natural Gas Act, 15 U.S.C. 717b(a). DOE will issue an export authorization upon receipt of any complete application to conduct small-scale natural gas exports. DOE’s regulations regarding notice of applications, 10 CFR 590.205, and procedures applicable to application proceedings, 10 CFR part 590, subpart C (10 CFR 590.303 to 10 CFR 590.317), are not applicable to small-scale natural gas exports”).

<sup>11</sup> 10 C.F.R. § 590.102(p).

<sup>12</sup> Final Rule, Small-Scale Natural Gas Exports, Docket No. 17-86-R, Fed. Reg. Vol. 83, No. 143 at 35107 (July 25, 2018).

## VII. ENVIRONMENTAL IMPACT

As described, TEXAWATT intends to export LNG produced at the existing facilities from Port Everglades, Florida, the Port of Miami, Florida and/or the Port of Galveston, Texas via ISO containers transported on a barge to St. Lucia and other islands in the Caribbean, and countries in Central and South America. DOE regulations provide a list of categorical exclusions from the preparation of an environmental analysis or environmental impact statement under NEPA. Categorical exclusion B5.7 (“Export of natural gas and associated transportation by marine vessel”) affords an exclusion, in relevant part, for “[a]pprovals . . . of new authorizations . . . to export natural gas under section 3 of the Natural Gas Act that involve minor operational changes (such as changes in natural gas throughput, transportation, and storage operations) but not new construction.”<sup>13</sup> The export authorization requested by TEXAWATT will not require new construction, expansion or modification and accordingly qualifies for categorical exclusion B5.7.

## VIII. APPENDICES

The following appendices are included with this Application:

**Appendix A:** Verification

**Appendix B:** Opinion of Counsel

**Appendix C:** Potential Sources of LNG

## IX. CONCLUSION

For the foregoing reasons, TEXAWATT respectfully requests DOE/HGEO grant the requested long-term and short-term multi-contract authorization for LNG exports of up to 51.75 Bcf total annually from Port Everglades, Florida, the Port of Miami, Florida, the Port of Galveston, Texas and from locations in Appendix C to St. Lucia and other islands in the Caribbean, and countries in Central and South America without modification or delay.

Respectfully submitted,

/Stanley Silver/

Stanley Silver

Stanley Silver Attorney At Law

120 N. Maclay Ave Suite F

San Fernando, CA 91340

Telephone: 818.361.0171; Fax: 818.361.6850

Email: stanley@stanleysilveresq.com

Counsel for TEXAWATT, INC. DBA TEXAS TEA FUELS & LUBES

January 31, 2026

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13 10 C.F.R. Part 1021, Subpart D, App. B, Categorical Exclusion B5.7.

**APPENDIX A**

**UNITED STATES OF AMERICA  
DEPARTMENT OF ENERGY  
HYDROCARBONS AND GEOTHERMAL ENERGY OFFICE**

**TEXAWATT, INC. DBA TEXAS TEA FUELS & LUBES)      DOE/HGEO Docket No. \_\_\_\_\_**

**VERIFICATION**

I, Michael Silver, declare that I am President/CEO of **TEXAWATT, INC. DBA TEXAS TEA FUELS & LUBES** and am duly authorized to make this Verification on behalf of **TEXAWATT, INC. DBA TEXAS TEA FUELS & LUBES**; that I have read the foregoing Application and that the facts stated therein are true and correct to the best of my knowledge, information and belief.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed in Tahoe City, California on January 31, 2026.

/Michael Silver/

Michael Silver

President/CEO

TEXAWATT, Inc.

425 N. Lake Blvd #7/ PO Box 1911

Tahoe City, CA 96145

Telephone: 530.320.6488

Email: mike@texawattpower.com

**APPENDIX B**  
**UNITED STATES OF AMERICA**  
**DEPARTMENT OF ENERGY**  
**HYDROCARBONS AND GEOTHERMAL ENERGY OFFICE**

**TEXAWATT, INC. DBA TEXAS TEA FUELS & LUBES)      DOE/HGEO Docket No. \_\_\_\_\_**

**OPINION OF COUNSEL**

This opinion is submitted pursuant to § 590.2029(c) of the Department of Energy's Regulations, 10 C.F.R. § 590.202(c) and concerning the request of TEXAWATT, INC. DBA TEXAS TEA FUELS & LUBES ("TEXAWATT") for a long-term authorization to export liquified natural gas. I am counsel for TEXAWATT. I have reviewed and relied upon the corporate formation documents of TEXAWATT and it is my opinion that the proposed export of liquified natural gas is within TEXAWATT's corporate powers.

Respectfully submitted,

/Stanley Silver/

Stanley Silver

Stanley Silver Attorney At Law

120 N. Maclay Ave Suite F

San Fernando, CA 91340

Telephone:818.361.0171; Fax:818.361.6850

Email: stanley@stanleysilveresq.com

Dated: January 31, 2026



## **APPENDIX C**

### **UNITED STATES OF AMERICA DEPARTMENT OF ENERGY HYDROCARBONS AND GEOTHERMAL ENERGY OFFICE**

**TEXAWATT, INC. DBA TEXAS TEA FUELS & LUBES)      DOE/HGEO Docket No. \_\_\_\_\_**

#### **LIQUEFACTION FACILITIES AND PORTS**

Below is a list of the facilities from which TEXAWATT, INC. DBA TEXAS TEA FUELS & LUBES (“TEXAWATT”) is seeking authority to currently source LNG for export. TEXAWATT will notify DOE/HGEO of any additional facilities from which it will source LNG for export.

1. JAX LNG, Jacksonville, Florida. JAX LNG, a liquefied natural gas (“LNG”) facility located at Dames Point in Jacksonville, FL, is owned by subsidiaries of Southern Company Gas and North Star Midstream, LLC. The JAX LNG facility has the capacity to produce 120,000 gallons of LNG per day and store more than 2 million gallons of LNG.
2. Eagle LNG Partners, Maxville, Florida. Eagle LNG has built a natural gas liquefaction plant near Jacksonville, FL, which offers a capacity of 200,000 gallons per day (87,000 gallons per day initially). The Eagle LNG facility is located west of downtown Jacksonville and features a 1,000,000-gallon storage tank and an LNG truck loading system. The facility is also designed to load LNG ISO containers for transport to nearby island markets. To support fueling ships, Eagle LNG is building a fuel depot dockside at the Talleyrand Marine Terminal on the St. Johns River.
3. Miami LNG plant, Hialeah, Florida. 100,000 gallon per day capacity, 270,000 of permanent on-site storage. They are able to load LNG ISOs on the Florida East Coast Railway for transport to Port Everglades. LNG Source: Liquefaction.
4. Pivotal LNG, Trussville, AL. Pivotal LNG, a wholly-owned subsidiary of Berkshire Hathaway Energy Gas Transmission and Storage, owns and operates the Trussville LNG plant located in Trussville, Alabama. The plant currently has storage of 4.8 million gallons and produces approximately 60,000 gallon per day. Trussville has two scales and three loading racks to allow multiple transfers and truck loading operations simultaneously.
5. Stabilis Energy, George West, Texas. The George West LNG facility is a small-volume LNG production facility located in the Eagle Ford shale production area in George West, Texas. The facility is owned and operated by Flint Hills Resources and has a liquefaction capacity of 120,000 gallons per day and a 40,000 gallon LNG Fuel Depot in Odessa providing customers with access to LNG 24 hours a day. The facility features two truck loading racks that can load two transport trailers simultaneously in less than an hour.
6. Clean Energy Pickens Plant, Willis, Texas. The Clean Energy LNG facility in Willis, Texas known as the Pickens Plant is a small-volume LNG production owned and operated by Clean Energy Fuels Corporation. The facility has a liquefaction capacity of 100,000 gallons per day and a storage capacity of 1 million gallons. The facility is capable of loading twelve (12) trucks per day.

7. NuBlu, Port Allen Plant, Louisiana. The Port Allen Plant is a small-volume LNG production facility owned and operated by NuBlu along the Mississippi River in Louisiana utilizing high and low-pressure natural gas pipelines. The 30,000 gallons per day facility, expandable to 90,000 gallons per day, is equipped with scales, loadout and 100,000 gallons of permanent storage.
8. Kinetrex Energy, Indianapolis, IN. Kinetrex Energy, a wholly-owned subsidiary of Kinder Morgan, operates two LNG facilities in Indianapolis, known as the LNG North Plant and the LNG South Plant. Each facility has 1 bcf of storage capacity, converts approximately 125,000 gallons of LNG per day and has two loading stations capable of fueling 48 loads of LNG daily.
9. Frontier Natural Resources, Inc. Frontier is an independent oil and gas producer based in central Pennsylvania. Frontier produces LNG from stranded natural gas assets. It operates two small-scale LNG facilities, one in Mansfield, PA and the other in Clearfield, PA. The Mansfield facility produces 6,000 gallons of LNG per day. The LNG is stored on site for transfer to cryo-tankers for transport to market. The Clearfield facility produces 36,000 gallons of LNG per day that is similarly stored on site for transfer to cryo-tankers for transport to market
10. Alkane Midstream, Seminole Plant, Texas. The Seminole Plant is a small-volume LNG production facility owned and operated by Alkane Midstream in Seminole, TX, using pipeline gas. The 60,000 gallons per day facility, expandable to 100,000 gallons per day, is equipped with scales, loadout and 60,000 gallons of permanent storage.
11. Coosada LNG facility, Spire Energy, Alabama 80 MMCF Total Capacity, LNG Source: Liquefaction.
12. Pinson LNG facility, Spire Energy, Alabama 120 MMCF Total Capacity, LNG Source: Liquefaction.
13. East Lauderdale LNG Facility, Spire Energy, Alabama 2.988 MMCF Total Capacity, LNG Source: Truck.
14. Double Springs LNG Facility, Spire Energy, Alabama .768 MMCF Total Capacity, LNG Source: Truck.
15. Cherokee LNG Facility, Atlanta Gas Light Co. 624 MMCF Total Capacity, LNG Source: Liquefaction.
16. Macon LNG Facility, Atlanta Gas Light Co. 150 MMCF Total Capacity, LNG Source: Liquefaction.
17. Riverdale LNG, Atlanta Gas Light Co. 400 MMCF Total Capacity, LNG Source: Liquefaction.