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UNITED STATES OF AMERICA  
BEFORE THE DEPARTMENT OF ENERGY  
HYDROCARBONS AND GEOTHERMAL ENERGY OFFICE

In the Matter of )  
 ) HGEo Docket No. 26-[ ]-LNG  
NAVERGY INFRASTRUCTURE PARTNERS LLC )

APPLICATION NAVERGY INFRASTRUCTURE PARTNERS LLC  
FOR LONG-TERM, MULTI-CONTRACT AUTHORIZATION  
TO EXPORT LIQUEFIED NATURAL GAS TO  
FREE-TRADE AGREEMENT AND NON-FREE TRADE AGREEMENT NATIONS

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PARTNERS LLC

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**In the Matter of** ) **Docket No. 26-[ ]-LNG**  
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**APPLICATION OF NAVERGY INFRASTRUCTURE PARTNERS LLC  
FOR LONG-TERM, MULTI-CONTRACT AUTHORIZATION  
TO EXPORT LIQUEFIED NATURAL GAS TO  
FREE-TRADE AGREEMENT AND NON-FREE TRADE AGREEMENT NATIONS**

Pursuant to Section 3 of the Natural Gas Act (“NGA”)<sup>1</sup> and Part 590 of the Department of Energy’s (“DOE”) regulations,<sup>2</sup> NAVERGY INFRASTRUCTURE PARTNERS LLC (“Navergy”) hereby files this application (“Application”) with the Hydrocarbons and Geothermal Energy Office of the DOE (“DOE/HGEO”) for long-term and short-term authorization, to export domestically produced liquefied natural gas (“LNG”).<sup>3</sup> Specifically, Navergy requests authorization to export LNG of up to the equivalent of 51.75 billion cubic feet (“Bcf”) of natural gas per year to any country with which the United States either (1) has a Free Trade Agreement (“FTA”) requiring national treatment for trade in natural gas or (2) does not have such a FTA but with which trade is not prohibited by United States law or policy (“non-FTA” nations).<sup>4</sup>

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<sup>1</sup> 15 U.S.C. § 717(b) (2018).

<sup>2</sup> 10 C.F.R. Part 590 (2024).

<sup>3</sup> DOE/FE issued a Policy Statement on December 18, 2020, discontinuing its practice of issuing separate long-term and short-term authorizations for exports of natural gas from the same facility. “Including Short-Term Export Authority in Long-Term Authorizations for the Export of Natural Gas on a Non-Additive Basis,” Policy Statement, 86 Fed. Reg. 2243 (Jan. 12, 2021). Instead, long-term authorizations to export domestically produced natural gas may include additional authority to export the same approved volume pursuant to transactions with terms of less than two years on a non-additive basis. Accordingly, Navergy requests that its long-term authorization also allow for LNG exports on a short-term or spot basis.

<sup>4</sup> The U.S. currently has FTAs requiring national treatment for trade in natural gas with Australia, Bahrain, Canada, Chile, Colombia, Dominican Republic, El Salvador, Guatemala, Honduras, Jordan, Mexico, Morocco, Nicaragua, Oman, Panama, Peru, Republic of Korea, and Singapore. In addition to current FTA nations, Navergy expressly requests that its FTA authorization include any additional nation which DOE subsequently identifies publicly as having entered into a free trade agreement providing for national treatment for trade in natural gas, or that otherwise is treated as (or equivalent to) an FTA nation by the United States, provided that the destination nation has the capacity to import LNG. For ease of reference, Navergy refers herein to all such nations simply as “FTA nations.”

With respect to exports to non-FTA nations, the Application is submitted under DOE's rule expediting the application and approval process for "small-scale" natural gas exports.<sup>5</sup> Navvergy requests this export authorization for use on behalf of itself when it owns the LNG and as agent for other entities that would hold title to the LNG at the time of export, for a period extending through the end of 2050, consistent with DOE policy.

Navvergy is filing this application in conjunction with its plan to export small quantities of LNG in International Organization for Standardization ("ISO") containers to various countries, including but not limited to, the Caribbean, Central America, and South America.<sup>6</sup> Navvergy primarily plans to (i) source LNG from the small-scale liquefaction and peaking facilities listed in Appendix C (ii) transport the LNG in approved ISO containers by barge or by road using Department of Transportation ("DOT")-approved highway trailers from the facilities in Appendix C to existing ports handling ISO containers (iii) load the ISO containers onto ocean-going container vessels, and (iv) export the LNG to emerging markets. Navvergy will comply with DOE's established reporting requirements, including with respect to destinations.

Numerous facilities around the country currently sell LNG on a commercial basis which potentially could be exported by Navvergy. To provide Navvergy maximum flexibility to meet the needs of its customers, Navvergy includes in Appendix C a list of all facilities from which it may obtain LNG for export. Navvergy requests that its export authorization encompass LNG sourced from any of those facilities. To the extent Navvergy seeks to export LNG from facilities that are not listed in Appendix C, Navvergy will file to amend its application to include such facilities. The source of any LNG produced at the facilities listed in Appendix C will be the vast natural gas supply produced throughout the United States and delivered to such facility through the integrated natural gas pipeline grid.

Navvergy's exports will provide significant benefits to the United States. Exports of LNG will benefit U.S. natural gas producers, which will have access to additional markets for their readily available supplies. These exports will also (1) provide a low-cost source of supply of LNG to the destination markets that Navvergy serves,

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<sup>5</sup> 10 C.F.R. §590.208(a) (2023); Small-Scale Natural Gas Exports, Final Rule, 83 Fed. Reg. 35106 (July 25, 2018) (hereinafter the "Small-Scale Exports Rule").

<sup>6</sup> Navvergy intends to utilize ISO containers that have been specified as ASME tanks and have been approved by the Department of Transportation for transporting LNG.

which will help shift these nations' consumption from more carbon-intensive fuels; and (2) help to meet the demand for natural gas in these markets, particularly in areas where large-scale LNG import and regasification facilities may be impractical for cost or timeline reasons.

## **I. DESCRIPTION OF THE APPLICANT**

The exact legal name of the applicant is NAVERGY INFRASTRUCTURE PARTNERS LLC. Navergy is a limited liability corporation organized and existing under the laws of the Republic of the Marshall Islands with its principal place of business located at 708 Main Street, Floor 10, Houston, Texas 77002. Navergy is a partnership owned by COOK NAUTICAL SERVICES LLC, MAGPIE ENERGY LLC and HERMES ENERGY LLC.

## **II. COMMUNICATIONS AND CORRESPONDENCE**

The names, titles and mailing addresses of the persons to whom correspondence and communications concerning this Application, including service of all pleadings and notices, are to be addressed are:

Shaun Davison, Officer Navergy Infrastructure Partners LLC 708 Main Street, Floor 10 Houston, TX 77002 (346) 436-7281 <a href="mailto:shaun.davison@navergyinfra.com">shaun.davison@navergyinfra.com</a>	Howard L. Nelson Greenberg Traurig LLP 2101 L Street, N.W., Suite 1000 Washington, D.C. 20037 (202) 331-3100 <a href="mailto:nelsonh@gtlaw.com">nelsonh@gtlaw.com</a>
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These individuals are designated to receive service and should be placed on the official service list for this proceeding.

## **III. AUTHORIZATION REQUESTED**

### **A. Export Authorization.**

Navergy requests authorization to export LNG of up to the equivalent of 51.75 Bcf of domestic natural gas per year to both FTA and non-FTA nations, for a term extending through December 31, 2050. Navergy expects that its LNG exports will primarily be short-term (less than two years duration) transactions, but Navergy seeks here long-term export authorization to provide it the flexibility to enter into both short-term and long-term arrangements, consistent with DOE's policy.<sup>7</sup> Because Navergy is currently in discussions for the procurement of LNG from

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<sup>7</sup> See note 3.

several of the third-party facilities listed in Appendix C, Navvergy may commence LNG exports soon after issuance of the requested export authorization though it does not currently have specific commitments to do so. Accordingly, Navvergy requests that its export authorization commence effective upon the issuance of the authorizing order.

**B. Agency Authorization.**

Navvergy may contract with third-party sellers and distributors to purchase LNG for export. Therefore, Navvergy requests export authority on behalf of itself and as agent for other title holders of LNG. DOE has consistently granted the type of agency authority sought here by Navvergy. DOE first addressed the concept of agency rights in Freeport LNG Expansion, L.P. and FLNG Liquefaction, LLC (“FLEX”). DOE found that “FLEX has requested an acceptable process by which FLEX can act as agent for others who want to export LNG” and that “FLEX’s agency rights and registration procedures are an alternative to the non-binding policy adopted by DOE in DOE Opinion and Order No. 2859 . . . that the title for all LNG authorized to be exported shall be held by the authorization holder at the point of export.”

DOE also accepted FLEX’s proposal to file the relevant long-term commercial agreements under seal once they have been executed. DOE stated that by: “accepting FLEX’s requested registration process and contract terms, DOE will ensure that the title holder is aware of all requirements in the Order, including destination restrictions, that DOE will have a record of all authorized exports, and that DOE will have direct contact information and point of contact with the title holder.” DOE concluded that “[t]his process is responsive to current LNG markets and provides an expedited process by which companies seeking to export LNG can do so.” DOE should grant Navvergy’s proposed procedure as it is identical to the procedure that DOE consistently has granted.

**IV. CONSISTENCY WITH THE PUBLIC INTEREST**

Section 3(c) of the NGA, as amended by § 201 of the Energy Policy Act of 1992, requires that applications to authorize exports of natural gas, including LNG, to nations with which there is in effect a FTA requiring national treatment for trade of natural gas be “deemed to be consistent with the public interest” and “granted without modification or delay.”<sup>8</sup> In addition, DOE/FE has held that the statutory requirement for granting FTA applications without delay or modification overrides otherwise applicable regulatory requirements for public notice and other

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<sup>8</sup> 15 U.S.C. § 717b(c).

procedures set forth in 10 C.F.R. Part 590. Under this statutory structure, the portion of this Application that requests authorization for Navergy to export LNG to FTA countries should be granted without modification or delay, consistent with the statute and DOE/FE's established practice.

With respect to exports to non-FTA nations, Section 3(a) of the NGA<sup>9</sup> sets forth the following statutory standard:

[N]o person shall export natural gas from the United States to a foreign country or import any natural gas from a foreign country without first having secured an order of the [Secretary of Energy]<sup>10</sup> authorizing it to do so. The [Secretary] shall issue such order upon application, unless after opportunity for hearing, [he] finds that the proposed exportation or importation will not be consistent with the public interest. The [Secretary] may by [the Secretary's] order grant such application, in whole or in part, with such modification and upon such terms and conditions as the [Secretary] may find necessary or appropriate.

In the Small Scale Exports Rule, DOE determined, by rule, that “small-scale” natural gas exports are consistent with the public interest as required for authorization under NGA Section 3(a). Pursuant to the rule and its implementing regulations, small-scale natural gas exports are exports of natural gas, including LNG, that meet two criteria: (1) the quantity to be exported is 51.75 Bcf per year or less and (2) DOE’s authorization of the exports does not require the preparation of an environmental impact statement or environmental assessment under the National Environmental Policy Act (NEPA) of 1969 (42 U.S.C. 4321, et seq.).<sup>11</sup>

Navergy requests authorization here of exports up to the volumetric limit established in the Small Scale Exports Rule. With respect to NEPA, DOE has established a categorical exclusion for the export of natural gas and associated transportation by marine vessel.<sup>12</sup> Navergy will export LNG produced at existing facilities and transport in ISO containers to commercial ports where it will be loaded using existing facilities onto ocean-going carriers, consistent with the scope of this categorical exclusion from NEPA. No construction will be required in connection with this authorization.<sup>13</sup> Thus, DOE approval of Navergy’s request does not require the preparation of an

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<sup>9</sup> 15 U.S.C. 717b(a).

<sup>10</sup> The Secretary’s authority was established by the DOE Organization Act of 1977, which transferred jurisdiction over gas import and export authorizations from the Federal Power Commission.

<sup>11</sup> 10 C.F.R. § 590.102(p); Small Scale Exports Rule 83 Fed. Reg. at 35113-15.

<sup>12</sup> 10 C.F.R. Part 1021, subpart D, appendix B5.7.

<sup>13</sup> Navergy seeks authority to source gas from any facilities that may be constructed in the future only after such Facilities have been constructed and listed in an amended Appendix C.

environmental impact statement or environmental assessment. Therefore, in accordance with the Small Scale Exports Rule, the authorization for exports to non-FTA nations requested by Navergy is consistent with the public interest and should be granted by DOE.

In the Small Scale Exports Rule, DOE announced that it will issue qualifying small volume export authorizations on an expedited basis and will not provide notice of each individual application nor apply other administrative procedures typically conducted for non-FTA export applications under DOE's regulations set forth at 10 C.F.R. Section 590.205 and Part 590, subpart C,<sup>14</sup> DOE has consistently followed that expedited approval process for recent small volume export applications.<sup>15</sup> Navergy respectfully requests that DOE grant the long-term export authorizations requested in this Application on a similar expedited basis.

At this time, Navergy has not yet entered into any contracts associated with the export of LNG, but it will file, or cause to be filed, any such long-term contracts entered into in the future within 30 days after execution in accordance with established DOE policies. Navergy commits that it will comply with all requirements imposed by DOE/FE on Navergy as an exporter and agent, including that Navergy will:

a. Register each LNG title holder for whom Navergy seeks to export as agent, with such registration including a written statement by the LNG title holder acknowledging and agreeing to comply with all applicable requirements imposed by DOE/FE in Navergy's export authorization and to incorporate those requirements in any subsequent purchase or sale agreement entered into by that title holder; and

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<sup>14</sup> Small-Scale Exports Rule, 83 Fed. Reg. at 35117.

<sup>15</sup> See, e.g., MKVH Advisors, Inc., Docket No. 22-69-LNG, DOE/FERC Order No. 4875 (Sept. 23, 2022)(approving application filed July 11, 2022, without public notice or other similar process); Otter Industries, LLC, Docket No. 22-123-LNG, DOE/FERC Order No. 4926 (Dec. 7, 2022)(approving application filed Sept. 15, 2022, without public notice or other similar process); Manifest Shipping & Trading Corp., Docket No. 22-145-LNG, DOE/FERC Order No. 4927 (Dec. 13, 2022)(approving application filed Sept. 26, 2022, without public notice or other similar process); STXM LLC, Docket No. 22-125-LNG, DOE/FERC Order No. 4928 (Dec. 13, 2022)(approving application filed Sept. 28, 2022, without public notice or other similar process; Eagle LNG Partners Jacksonville II LLC, Docket Nos. 22-168-79 and 17-79-LNG, DOE/FERC Order Nos. 4975 and 4078-B (March 12, 2022)(approving application filed Dec. 29, 2022, without public notice or other similar process).

b. File under seal with DOE/FE any relevant long-term commercial agreements once they have been executed, consistent with DOE/FE's established policy.<sup>16</sup>

Navergy respectfully requests the DOE grant the authorizations requested herein expeditiously and without the need for administrative procedures, consistent with its treatment of similar "small-scale" export applications.

## V. APPENDICES

The following appendices are attached to this Application: Appendix A: Verification

Appendix B: Opinion of Counsel

Appendix C: List of Potential LNG Sources

## VI. CONCLUSION

Based on the reasons set forth above, Navergy respectfully requests that the DOE/FE expeditiously issue the requested long-term multi-contract authority to export LNG produced from domestic natural gas sources at the LNG facilities specifically identified in Appendix C), in quantities of up to the equivalent of 51.75 Bcf of natural gas per year to both FTA and non-FTA nations, for a term extending through December 31, 2050.

Respectfully submitted,



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Counsel for  
NAVERGY INFRASTRUCTURE  
PARTNERS LLC

Dated: February 9, 2026

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<sup>16</sup> DOE/FE has found that the commitment to file contracts once executed complies with the requirement of 10 C.F.R. § 590.202(b) to provide transaction-specific information "to the extent practicable." See, e.g., Sabine Pass Liquefaction, LLC, DOE/FE Order No. 2961 at 41, FE Docket No. 10-111-LNG (May 20, 2011); Cheniere Marketing, LLC, DOE/FE Order No. 4519 at 8-9, FE Docket No. 19-124-LNG (Apr. 14, 2020); Commonwealth at 7.

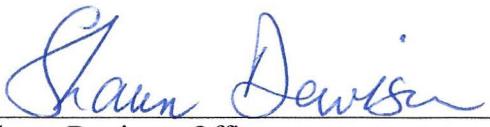
## **Appendix A**

## VERIFICATION

The undersigned, being duly sworn, on oath states that he is the authorized representative of NAVERGY INFRASTRUCTURE PARTNERS LLC, duly authorized to make this Verification: that he has read the foregoing application and that all the statements and matters contained therein are true and correct to the best of his information, knowledge 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 The Woodlands, Texas on February 9, 2026.



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Shaun Davison  
Shaun Davison, Officer  
NAVERGY INFRASTRUCTURE PARTNERS LLC

## **Appendix B**

### **Opinion of Counsel**

This opinion is submitted pursuant to 10 C.F.R. Section 590.202(c) of the Department of Energy administrative procedures. The undersigned is counsel to NAVERGY INFRASTRUCTURE PARTNERS LLC.

I have reviewed the corporate documents of NAVERGY INFRASTRUCTURE PARTNERS LLC and it is my opinion that the proposed export of natural gas is within the company's corporate powers.

Respectfully submitted,



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Counsel for  
NAVERGY INFRASTRUCTURE PARTNERS  
LLC

Dated: February 9, 2026

## **APPENDIX C**

### **List of Potential LNG Sources**

The following facilities are operational but have not been licensed by FERC. A description of these facilities based on publicly available information is provided.

1. Puget LNG; Tacoma, WA. LNG production of approximately 225,000 gallons per day with 1.7 million gallons of storage.
2. George West LNG Facility; George West, TX. LNG production capacity of approximately 120,000 gallons per day.
3. Pickens Plant Facility; Willis, TX. LNG production capacity of approximately 100,000 gallons per day and 1 million gallons of storage.
4. Port Allen LNG Facility; Port Allen, LA. LNG production capacity of 30,000 gallons per day and 100,000 LNG gallons of storage.
5. Trussville LNG Facility; Trussville, AL. LNG production capacity of approximately 60,000 gallons per day, and 4.8 million gallons of storage.
6. JAX LNG Facility; Jacksonville, FL. LNG production capacity of approximately 360,000 gallons per day and 4 million gallons of storage.
7. Maxville LNG Facility; Jacksonville, FL. LNG production capacity of 187,000 gallons per day with 1 million gallons of storage.
8. Sawgrass LNG Facility; Miami, FL. LNG production of approximately 100,000 gallons per day with 270,000 gallons of storage.