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

In the Matter of)
) **Docket No. 26-__-LNG**
COVE POINT LNG, LP)

**APPLICATION OF COVE POINT LNG, LP
FOR RENEWED BLANKET AUTHORIZATION
TO EXPORT PREVIOUSLY IMPORTED LIQUEFIED NATURAL GAS
BY VESSEL FROM THE COVE POINT TERMINAL IN CALVERT COUNTY, MARYLAND**

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Filed: March 16th, 2026

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Pursuant to Section 3 of the Natural Gas Act (“NGA”) 1/ and Part 590 of the regulations of the Department of Energy (“DOE”), 2/ Cove Point LNG, LP (“Cove Point”) hereby files this application (“Application”) with the Office of Hydrocarbons and Geothermal Energy (“DOE/HGEO”)³ of the DOE for short-term, blanket authorization to export pursuant to transactions with terms of no longer than two years liquefied natural gas (“LNG”) that has been previously imported to the United States from foreign sources. Cove Point requests blanket authorization to export previously-imported LNG in volumes of up to the equivalent of 70 billion cubic feet (“Bcf”) of natural gas over a two-year period by vessel from its existing LNG import/export terminal in Calvert County, Maryland (the “Terminal”). Cove Point requests this new authorization to replace its existing, essentially identical, blanket authorization to export previously imported LNG issued in DOE/FECM Order No. 5142, 4 which will expire on July 7, 2026. Accordingly, Cove Point respectfully requests that DOE/HGEO grant this application for renewed

1 15 U.S.C. § 717(b) (2018).

2 10 C.F.R. Part 590 (2025).

3 DOE’s Office of Fossil Energy (“FE”) changed its name on July 4, 2021, to the Office of Fossil Energy and Carbon Management (“FECM”) and then, on November 20, 2025, FECM changed its name to the Hydrocarbons and Geothermal Energy Office (“HGEO”). Cove Point herein uses the acronym for the office in effect at the time of the relevant order or action discussed, or simply use the term DOE to encompass the office. Authority to regulate the import and export of natural gas under NGA Section 3 has been delegated to the Assistant Secretary for (as currently termed) HGEO, most recently pursuant to Redelegation Order No. SD-DEL-FE1-2023, issued on April 10, 2023.

4 *Cove Point LNG, LP*, DOE/FECM Order No. 5142, Docket No. 24-30-LNG (July 3, 2024).

authorization prior to that date, so as to allow Cove Point to retain, without interruption, its authority to provide exports of previously imported LNG under short-term transactions, if and when operationally, contractually, and economically desirable.

Cove Point requests the renewed blanket authorization (like its existing one) solely for LNG previously imported by vessel at the Terminal from foreign sources because its long-term authorizations encompass short-term exports of domestically produced natural gas. Cove Point requests the new blanket authorization for short-term re-exports to any country with the capacity to import LNG via ocean-going carrier and with which trade is not prohibited by U.S. law or policy, whether or not the country has a Free Trade Agreement (FTA) with the United States requiring national treatment for trade in natural gas: in other words, for exports to both FTA and non-FTA countries. Cove Point requests this authorization both on its own behalf and when acting as agent on behalf of other entities who themselves hold title to the LNG after registering each such entity with DOE/FECM in accordance with the established procedures. The requested authorization does not involve the construction of any new or additional facilities, nor any physical modification to the Terminal or its operations.

In support of this Application, Cove Point respectfully shows as follows:

I. DESCRIPTION OF THE APPLICANT

Cove Point's exact legal name is Cove Point LNG, LP. Cove Point is a limited partnership organized and existing under the laws of the State of Delaware with its principal place of business at 2100 Cove Point Road, Lusby, Maryland 20657. Cove Point also has business offices located at 10700 Energy Way, Glen Allen, Virginia 23060. Cove Point owns and operates the Cove Point Terminal, an LNG import and export terminal located in Calvert County, Maryland ("Terminal"), as well as associated interstate pipeline facilities that extend approximately 88 miles from the Terminal to interconnections with three other interstate pipelines. The Terminal has long been used to import LNG. Beginning in 2018, Cove Point began to export LNG from the Terminal, rendering it a bi-directional facility capable of both imports and exports of LNG.

The general partner of Cove Point is Cove Point GP Holding Company, LLC, an indirect wholly-owned subsidiary of BHE GT&S LLC ("BHE GT&S"). BHE GT&S is an indirect wholly-owned subsidiary of Berkshire Hathaway Energy Company ("BHE"), that also owns seventy-five percent (75%) of CPL's limited partnership interest. The remaining twenty-five percent (25%) of Cove Point's limited partnership interest is owned by Bowie Acquisitions LLC, an affiliate of Brookfield Asset Management Inc., a global alternative asset manager.

BHE GT&S is a limited liability corporation organized and existing under the laws of the State of Delaware with its principal place of business at 10700 Energy Way, Glen Allen, Virginia 23060. BHE GT&S is an interstate natural transmission and storage company operating approximately 5,400 miles of transmission lines and over 750 Bcf of natural gas storage in the eastern United States, as well as LNG businesses.

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:

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These individuals are designated to receive service and should be placed on the official service list for this proceeding.

III. BACKGROUND AND EXISTING AUTHORIZATIONS

The Federal Energy Regulatory Commission (“FERC”) in 2014 authorized Cove Point, pursuant to NGA Section 3, to site, construct, and operate its Liquefaction Project at the Terminal.⁵ The Liquefaction Project includes one liquefaction train with capacity to produce up to 5.75 million metric tonnes per annum (“MTPA”) of LNG, as well as other related facilities, as fully explained in the relevant FERC orders. Cove Point exported LNG from the Terminal for the first time on March 2, 2018, and placed its Liquefaction Project fully in service on April 9, 2018. Since that time, the Cove Point Terminal has operated predominantly as an export Terminal but it retains bi-directional capabilities and operations.

In DOE/FE Order No. 3019, issued on October 7, 2011 in Docket No. 11-115-LNG, DOE issued long-term, multi-contract authorization for Cove Point to export domestically produced LNG by vessel from the Terminal to countries with which the United States has, or in the future enters into, a FTA requiring national treatment for trade in natural gas (“FTA countries”) in a volume up to the equivalent of 365 Bcf of natural gas per year for a period of 25 years. In DOE/FE Order No. 3331, issued on

⁵ *Dominion Cove Point LNG, LP*, 148 FERC ¶ 61,244 (2014), *reh’g denied*, 151 FERC ¶ 61,095 (2015), *petition for review denied sub nom. Earth Reports, Inc. v. FERC*, 828 F.3d 949 (D.C. Cir. 2016).

September 11, 2013 in Docket No. 11-128-LNG, DOE conditionally granted Cove Point long-term, multi-contract authority to export domestically produced LNG by vessel from the Terminal to nations with which the United States has not entered into such an FTA (“non-FTA countries”), conditioned on the satisfactory completion of the environmental review process for the Liquefaction Project that was then on-going in the FERC proceedings. Order No. 3331 authorized export of LNG to non-FTA countries in volumes equivalent to 281 Bcf of natural gas per year or approximately 5.75 MTPA, equivalent to the liquefaction capacity of the Liquefaction Project for a period of 20 years. The volumes authorized in Order No. 3019 and No. 3331 are *not* additive. In both orders, DOE authorized Cove Point to export the LNG solely as agent for other entities that will hold title to the LNG pursuant to one or more long-term (greater than two year) contracts, after registering each such entity with DOE/FE.

Following the FERC order authorizing the Liquefaction Project, with the environmental condition of Order No. 3331 having been satisfied, DOE issued on May 7, 2015 its “Final Opinion and Order,” DE/FE Order No. 3331-A, authorizing Cove Point to export LNG to non-FTA countries. Order No. 3331-A authorizes Cove Point to export LNG up to the equivalent of 281 Bcf per year to non-FTA countries, while acting as an agent for others pursuant to long-term contracts, for a term of 20 years commencing on the earlier of the date of first commercial export or seven years from the date of order issuance. DOE later denied a request for rehearing and affirmed its previous findings and conclusions in DOE/FE Order No. 3331-B, issued on April 16, 2016. DOE subsequently extended the term of Cove Point’s FTA and non-FTA long-term authorizations through December 31, 2050.⁶

In addition to its long-term export authorizations, Cove Point has also been issued by DOE, beginning in 2017, a series of blanket export authorizations for transactions of no longer than two years. The first two such blanket authorizations applied to both domestically produced and previously imported

⁶ DOE/FE Order No. 3019-B and 3331-D, Docket Nos. 11-115-LNG and 11-128-LNG (Oct. 21, 2020). The missing orders in the sequence, DOE/FE Order Nos. 3019-A and 3331-C, were amendments solely to reflect an earlier corporate name change issued on August 4, 2017. Similarly, DOE/FE Order Nos. 3019-C and 3331-E, issued on Dec. 2, 2020, granted a request for the amendment of those authorizations (along with then-existing blanket authorizations) to reflect a further change to Cove Point’s current name.

LNG for export to both FTA and non-FTA nations.⁷ On December 18, 2020, DOE issued a Policy Statement discontinuing its practice of issuing separate long-term and short-term authorizations for exports of domestically produced natural gas from the same facility.⁸ Instead, long-term export authorizations now include additional authority to export the same approved volume pursuant to transactions with terms of less than two years on a non-additive basis. Concurrently with that Policy Statement, DOE issued Order No. 4641, amending existing long-term authorizations, including those issued to Cove Point in Order Nos. 3019 and 3331 (as amended), to incorporate short-term exports.⁹ That order generally vacated, as no longer necessary, blanket authorizations issued to the holders of the long-term export authorizations; but vacated Cove Point’s then-effective blanket authorization only in part, with the authorization remaining in effect with respect to the export of LNG previously imported from foreign sources.¹⁰

DOE subsequently granted Cove Point separate blanket authorization to export pursuant to transactions with terms of no longer than two years LNG that has been previously imported to the United States from foreign sources, in volumes up to the equivalent of 70 Bcf of natural gas in total over the two-year period.¹¹ DOE first authorized those re-exports by Cove Point to both FTA and non-FTA nations in

⁷ See DOE/FE Order No. 4046, Docket No. 16-205-LNG (June 2, 2017)(authorizing export of up to 250 Bcf of natural gas pursuant to transactions with terms of no longer than two years for the two-year period commencing with the first export of LNG from the Terminal, which expired on March 2, 2020); DOE/FE Order No. 4508, Docket No. 19-156-LNG (Feb. 28, 2020)(identical authorization for the two-year term extending through March 1, 2022).

⁸ “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. at 2,243 (Jan. 12, 2021), available at: https://www.energy.gov/sites/prod/files/2020/12/f82/ST%20Exports%20Policy%20Statement_0.pdf.

⁹ See <https://www.energy.gov/sites/prod/files/2020/12/f82/ord4641.pdf>. Order No. 4641 sets out the list of amended long-term FTA authorizations, including those of Cove Point, in its Appendix B for FTA authorizations and Appendix B for non-FTA authorizations, while Appendix D lists Cove Point’s then existing short-term authorization as partially vacated.

¹⁰ Order No. 4641, Ordering Paragraph C. Appendix C of the Order lists the short-term authorizations vacated in their entirety while Appendix D shows the short-term authorizations (including Cove Point’s) that were partially vacated.

¹¹ The requested and authorized volume for re-exports was less than the amount authorized in Cove Point’s previous blanket export authorizations because they also encompassed short-term exports of domestically produced LNG, which became authorized instead by Cove Point’s long-term export authorizations.

Order No. 4849, which was issued on July 8, 2022 and by its terms expired on July 7, 2024. ¹² Then most recently, on July 3, 2024, DOE granted Cove Point its currently effective blanket authorization to export previously imported LNG to both FTA and non-FTA nations, again of up to the equivalent of 70 Bcf of natural gas, for a term that expires on July 7, 2026.

In addition to these export authorizations, Cove Point also has received a series of blanket authorizations to *import* LNG from various international sources by vessel. Under its current import authorization, Cove Point is authorized to import up to a total volume equivalent to 36 Bcf of natural gas over the two-year period ending on February 28, 2027.¹³ In addition, Cove Point may contract with customers in some circumstances allowing them to import LNG at the Terminal utilizing their own natural gas import authorizations.

IV. AUTHORIZATION REQUESTED

Cove Point respectfully requests renewed blanket authorization allowing it to export from its Terminal, pursuant to transactions with terms of no longer than two years, LNG that has been previously imported to the United States from foreign sources. Just as in the existing blanket authorization, Cove Point requests blanket authorization to export previously-imported LNG in volumes up to the equivalent of 70 Bcf natural gas in total over the two-year period. Cove Point requests that the term of the new authorization commence on the earlier of: (1) July 8, 2026 (the day after its current blanket authorization expires) or (2) the date of issuance of the new authorization. Cove Point respectfully requests, however, that DOE issue the requested authorization prior to July 8, 2026, so that its re-export authorization will continue to remain in effect without interruption.

Cove Point requests authorization to re-export this LNG to both (1) any country which has, or in the future develops, the capacity to import LNG via ocean-going carriers and with which the U.S. has, or in the future enters into, an FTA requiring the national treatment for trade in natural gas or is otherwise

¹² DOE/FECM Order No. 4849, Docket No. 22-22-LNG (July 8, 2022).

¹³ DOE/FECM Order No. 5244, Docket No. 24-156-LNG (Feb. 18, 2025).

deemed by the United States as being treated as an FTA nation, and (2) any country with the capacity to import LNG via ocean-going carriers and with which the United States does not have such an FTA but with which trade is not prohibited by United States law or policy. In other words, Cove Point seeks the blanket authorization for re-exports to both FTA countries and non-FTA countries.

While Cove Point expects that most LNG exported from the Terminal will be under long-term contracts and authorized under its long-term export authorizations, continuing authorization to allow other exports on a spot or short-term basis provides Cove Point increased flexibility to respond to market conditions and promote the maximum utilization of the Terminal. As previously noted, Cove Point's long-term authorizations cover short-term exports of domestically produced LNG, but not of previously imported LNG. For that purpose, just as with its prior blanket authorizations to re-export previously imported LNG issued in Order Nos. 4849 and 5142, the renewed authorization requested here is necessary to allow Cove Point's to provide exports of previously imported LNG under short-term transactions, if and when operationally, contractually, and economically desirable.

Notably, Cove Point continues to receive imports of LNG, in relatively small volumes, when warranted by domestic market conditions and needs. Thus, Cove Point received imported LNG equivalent to approximately 1.2 Bcf in 2024, approximately 1.2 Bcf in 2025, and approximately 4.7 Bcf already so far in early 2026. While none of this imported volume was subsequently re-exported, the requisite DOE authorization allowing for the potential re-export provides important flexibility allowing Cove Point (and its customers) to react to market conditions and to promote the maximum utilization of its LNG Terminal. Indeed, market participants may be more interested in importing LNG when seeing a potentially attractive opportunity to serve the U.S. market if they know that they retain the ability to re-export at least some of the imported LNG later if warranted in response to changing market forces and the pricing available in different markets. Thus, Cove Point's long-standing blanket authority to export previously imported LNG potentially may increase its receipt of imported volumes of gas available for domestic consumption, as well as providing the benefits of incremental LNG exports consistently recognized by DOE as discussed below.

Cove Point generally operates its Terminal as a “tolling facility,” providing services to other customers that own the LNG. Therefore, Cove Point anticipates that it generally will act under the requested blanket authorization as agent for others that will hold title to the LNG at the time of export. To promote maximum flexibility, however, Cove Point requests that its blanket authorization to re-export LNG apply both on its own behalf and when acting as agent for entities with which it would contract that hold title to the LNG at the time of export – just as in Cove Point’s existing blanket authorization for re-exports.¹⁴ Cove Point will comply fully with all applicable DOE requirements when acting as an agent for others, as required in its existing export authorizations and further explained in the Freeport LNG Development, L.P. and Cameron LNG orders referenced in those existing authorization.¹⁵ Thus, when acting as an agent, Cove Point will register with DOE/FECM each LNG title holder for which it seeks to export LNG as agent, and will provide the DOE/FECM a written statement by the title holder that acknowledges and agrees to (1) comply with all requirements in Cove Point’s export authorization, and (2) include those requirements in any subsequent purchase or sale agreement entered into by the title holder.

V. 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 a nation 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.”¹⁶ In addition, DOE/FECM has held that the statutory requirement for granting FTA applications without delay or modification overrides otherwise applicable regulatory requirements for public notice and other procedures set forth in 10 C.F.R. Part 590.

¹⁴ See DOE/FECM Order No. 5142, Finding No. 3.

¹⁵ *Id.*, discussing *Freeport LNG Expansion, L.P. and FLNG Liquefaction, LLC*, DOE/FE Order No. 2913, Docket No. 10-160-LNG (Feb. 10, 2011) (establishing the criteria for exports for agents subsequently adopted in a number of orders); *Cameron LNG, LLC*, DOE/FE Order No. 3680, Docket No. 15-36-LNG (July 10, 2015) (reiterating and explaining agency policy).

¹⁶ 15 U.S.C. § 717b(c).

Under this statutory structure, the portion of this Application that requests blanket authorization to re-export LNG from the Cove Point Terminal to FTA countries should be granted without modification or delay, consistent with DOE/FECM's established practice.

With respect to exports to non-FTA countries, Section 3(a) of the NGA 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] 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. ¹⁷

This statutory language creates a presumption that the proposed export of natural gas is in the public interest. Accordingly, DOE has consistently held that it must grant export applications unless opponents of the application overcome this presumption by making an affirmative demonstration that the proposed export is inconsistent with the public interest. ¹⁸ This interpretation has been affirmed by the U.S. Court of Appeals for the D.C. Circuit. ¹⁹

¹⁷ 15 U.S.C. 717b(a). 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.

¹⁸ *E.g.*, *Philips Alaska Natural Gas Corp. and Marathon Oil Co.*, DOE/FE Order No. 1473 at 13 (April 2, 1999); *Sabine Pass Liquefaction, LLC*, DOE/FE Order No. 2961 at 28 (May 20, 2011); *Dominion Cove Point LNG, LP*, DOE/FE Order No. 3331 at 7 (Sept. 11, 2013); *Dominion Cove Point LNG, LP*, DOE/FE Order No. 3331-B at 11 (April 18, 2016); *Venture Global Plaquemines LNG, LLC*, DOE/FE Order No. 4446 at 18-19 (Oct. 16, 2019); *Sabine Pass Liquefaction, LLC*, Order No. 4800 at 27 (March 16, 2022); *Sierra Club, et al.*, Order Denying Petition for Rulemaking on Exports of Liquefied Natural Gas, at 10 (July 18, 2023); *Venture Global CP2 LNG, LLC*, DOE/FECM Order No. 5264-A at 25 (Oct. 21, 2025).

¹⁹ *E.g.*, *Sierra Club v. U.S. Dep't of Energy*, 867 F.3d 189 at 203 (D.C. Cir. 2017).

The Policy Guidelines developed by DOE/FE to implement NGA Section 3 (which are applicable to exports as well as imports 20) promote the free and open trade of natural gas. 21 The Policy Guidelines were “designed to establish natural gas trade on a market-competitive basis and to provide immediate as well as long-term benefits to the American economy from this trade.” 22 Moreover, the Guidelines provide that:

The market, not government, should determine the price and other contract terms of imported [or exported] gas. U.S. buyers [sellers] should have full freedom – along with the responsibility – for negotiating the terms of trade arrangements with foreign sellers [buyers]....

* * *

The policy cornerstone of the public interest standard [of NGA Section 3] is competition. Competitive import [export] arrangements are an essential element of the public interest, and natural gas imported [exported] under arrangements that provide for the sale of gas in volumes and at prices responsive to market demands largely meets the public interest test....23

In authorizing long-term non-FTA exports for Cove Point (as well as in numerous other export authorizations), DOE has explained that it “continues to subscribe to the principle set forth in our 1984 Policy Guidelines that, under most circumstances, the market is the most efficient means of allocating natural gas supplies.”24 Thus, DOE has promoted the competitive, free-trade policies embodied in the

20 E.g., *Philips Alaska*, DOE/FE Order No. 1473 at 14; *Yukon Pacific Corp.*, DOE/FE Order No. 350, 1 FE ¶ 70,259 at 71,128 (1989); *Dominion Cove Point LNG, LP*, DOE/FE Order No. 3331 at page 8 (Sept. 11, 2013); *Sierra Club, et al.*, Order Denying Petition for Rulemaking on Exports of Liquefied Natural Gas, at 10 (July 18, 2023).

21 *Policy Guidelines and Delegation Orders Relating to the Regulation of Imported Natural Gas*, 49 Fed. Reg. 6,684 (Feb. 22, 1984).

22 *Id.* at 6,684.

23 *Id.* at 6685 and 6687. The parenthetical references to exports are added in the above quotation to reflect the applicability of the Policy Guidelines to exports. See note 22, *supra*.

24 *Dominion Cove Point LNG, LP*, Order No. 3331 at 141 (Sept. 11, 2013) and Order No. 3331-A at 97 (May 7, 2015). See also, e.g., *Freeport LNG Expansion, L.P.*, Order No. 3282 at 112 (May 17, 2013); *Cameron LNG, LLC*, Order No. 3391 at 132 (Feb. 11, 2014); *Sabine Pass Liquefaction, LLC*, Order No. 3669 at 210 (June 26, 2015); *Venture Global Plaquemines LNG, LLC*, DOE/FE Order No. 4446 at 42 (July 21, 2016); *Sabine Pass Liquefaction, LLC*, Order No. 4800 at 27 (March 16, 2022); *Venture Global CP2 LNG, LLC*, DOE/FECM Order No. 5264-A at 25 (Oct. 21, 2025).

Policy Guidelines by consistently authorizing LNG exports to non-FTA nations.²⁵ DOE should continue to follow its longstanding practice here by granting this Application.

DOE previously engaged in a robust and thorough analysis of the public interest in LNG exports from the Cove Point Terminal when authorizing long-term exports to non-FTA countries in Order Nos. 3331, 3331-A, and 3331-B. In its prior orders granting Cove Point blanket authorizations for short-term exports of previously imported LNG, DOE based the authorizations, in large part, on authoritative data indicating that U.S. consumers have access to substantial quantities of natural gas sufficient to meet domestic demand from other competitively priced sources.²⁶ To evaluate the availability of supply, DOE in those orders took administrative notice of the projections by the U.S. Energy Information Agency (“EIA”) in its then most-recent *Annual Energy Outlook* (“AEO”) and recognized that the projected domestic dry natural gas production was far in excess of the projected gas consumption for the upcoming two years. Taking that same approach with more recent data, the 2025 AEO projects annual dry natural gas production in 2026 and 2027 respectively of 38.94 and 39.09 Tcf, compared to total consumption in those same years of 32.13 and 32.54 Tcf.²⁷ Thus, the most recent data fully supports the continuing validity of DOE’s prior conclusion when previously issuing Cove Point’s blanket authorization to re-export previously imported LNG that:

Because domestic natural gas production levels are projected to reach an amount that well exceeds the amount of natural gas proposed for short-term export in Cove Point’s Application, we find that United States consumers will continue to have access to substantial quantities of natural gas sufficient to meet domestic demand from multiple other sources at competitive prices without drawing on the previously imported LNG that Cove Point seeks to export.²⁸

²⁵ A list of all the non-FTA approvals with docket numbers, volumes, and links to the relevant DOE/FE orders is available at: <https://www.energy.gov/fecm/articles/summary-lng-export-applications-lower-48-states>.

²⁶ See DOE/FECM Order No. 5142 at 8; DOE/FECM Order No. 4849 at 10.

²⁷ EIA, AEO 2025, at Table 13 *Natural Gas Supply, Disposition, and Prices (Reference Case)*, available at <https://www.eia.gov/outlooks/aeo/data/browser/#/?id=13-AEO2025&cases=ref2025&sourcekey=0>.

²⁸ DOE/FECM Order No. 5142 at 8-9; DOE/FECM Order No. 4849 at 10.

In its prior blanket authorizations of re-exports by Cove Point, DOE did not consider other factors bearing on the public interest beyond the key consideration of domestic need, at least in part because no other factors were raised in comments on the relevant applications.²⁹ Were DOE to consider other factors bearing on the public interest here, however, it would recognize that those factors strongly support authorizations to export LNG like that requested here. Indeed, the current Presidential Administration, and DOE as part of it, has strongly supported LNG exports, recognizing that they advance the public interest.³⁰ Importantly, the DOE has recently reaffirmed, after the conclusion of a major study and its consideration of public comments on it, its long-standing conclusion that “exports of LNG from the United States are in the best interest of the American public.”³¹ As DOE leadership recognized in announcing that conclusion: “The facts are clear: expanding America’s LNG exports is good for Americans and good for the world... LNG supports our economy, strengthens our allies, and enhances national security.”³² Accordingly, the DOE in the current Administration has advanced the “unleashing” of U.S. LNG exports in numerous recent orders.³³

²⁹ See DOE/FECM Order No. 5142 at 9; DOE/FECM Order No. 4849 at 10-11.

³⁰ Executive Orders issued on the first day of the Administration recognized the benefits of LNG exports. The Energy Emergency Executive Order recognized that “the United States has the potential to use its unrealized energy resources domestically, and to sell to international allies and partners a reliable, diversified, and affordable supply of energy. This would create jobs and economic prosperity for Americans forgotten in the present economy, improve the United States’ trade balance, help our country compete with hostile foreign powers, strengthen relations with allies and partners, and support international peace and security.” Exec. Order No. 14156, 90 Fed. Reg. 8,433 (Jan. 20, 2025). That same day, the Unleashing Energy Executive Order directed the DOE to “restart reviews of applications for approvals of liquefied natural gas export projects as expeditiously as possible, consistent with applicable law.” Exec. Order No. 14154, 90 Fed. Reg. 8353, 8357 (Jan. 20, 2025). That Executive Order also directs that “[i]n assessing the ‘Public Interest’ to be advanced by any particular application” to export LNG under NGA Section 3(a), DOE “shall consider the economic and employment impacts to the United States and the impact to the security of allies and partners that would result from granting the application.” *Id.*

³¹ See DOE Press Release, “DOE FINALIZES 2024 LNG EXPORT STUDY, PAVING WAY FOR STRONGER AMERICAN ENERGY EXPORTS,” May 19, 2025, <https://www.energy.gov/articles/doe-finalizes-2024-lng-export-study-paving-way-stronger-american-energy-exports> (announcing DOE’s “Response to Comments for the 2024 LNG Export Study: Energy, Economic, and Environmental Assessment of U.S. LNG Exports,” (hereinafter “DOE Response to Comments”), available at https://www.energy.gov/sites/default/files/2025-05/2024%20LNG%20Export%20Study_Response%20to%20Comments_Final_05.19.2025.pdf).

³² *Id.*

³³ A list of all the long-term non-FTA approvals with docket numbers, volumes, and links to the relevant DOE orders is available at: <https://www.energy.gov/fe/downloads/summary-lng-export-applications-lower-48-states>.

For all of these reasons, especially the thorough public interest analysis that DOE has already conducted regarding LNG exports from the Cove Point Terminal to non-FTA countries, the analysis that DOE/FECM conducted in its prior orders when issuing Cove Point's prior blanket authorization to export previously imported natural gas, and current data that continues to demonstrate more than ample supply for all domestic needs, the export authorization requested here should be granted as consistent with the public interest.

VI. ENVIRONMENTAL IMPACT

DOE regulations implementing the National Environmental Policy Act (NEPA) of 1969 (42 U.S.C. 4321, *et seq.*) set forth at 10 CFR Part 1021, Subpart D, Appendix B5 provide for a categorical exclusion for actions that normally do not require the preparation of an environmental analysis or environmental impact statement. Specifically, categorical exclusion B5.7 (10 C.F.R. Part 1021, Subpart D, Appendix B5), *Export of natural gas and associated transportation by marine vessel* provides for such a categorical exclusion. DOE has recognized this categorical exclusion from NEPA procedures when issuing Cove Point's prior blanket authorizations to export previously imported LNG,³⁴ and it should do the same again here.

VII. APPENDICES

The following appendices are attached to this Application:

Appendix A: Verification

Appendix B: Opinion of Counsel

³⁴ See DOE/FECM Order No. 5142 at 9; DOE/FECM Order No. 4849 at 11.

VIII. CONCLUSION

Based on the reasons set forth above, Cove Point respectfully requests that the DOE/HGEO grant Cove Point short-term, blanket authorization to re-export LNG previously imported from foreign sources of up to the equivalent of 70 Bcf of natural gas from its existing LNG Terminal in Calvert County, Maryland, to any country with the capacity to import LNG via ocean-going carrier and with which trade is not prohibited by U.S. law or policy, whether or not the country has a Free Trade Agreement with the United States requiring national treatment for trade in natural gas. Cove Point respectfully requests that the DOE/HGEO issue this renewed authorization by no later than July 8, 2026, so as to allow Cove Point's re-export authorization to remain in effect without interruption.

Respectfully submitted,

J. Patrick Nevins

J. Patrick Nevins (Mar 16, 2026 10:03:25 EDT)

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Counsel for
Cove Point LNG, LP

Dated: March 16th, 2026

Appendix A

Verification

STATE OF VIRGINIA)

) SS:

COUNTY OF HENRICO)

David Monger, being first duly sworn on his oath deposes and says: that he is the Director, Commercial Business for Cove Point LNG, LP.; that he is duly authorized to make this Verification; that he has read the foregoing submittal and is familiar with the contents thereof; that all the statements and matters contained therein are true and correct to the best of his information, knowledge and belief; and that he is authorized to execute and file the same with the U.S. Department of Energy.

David Monger
David Monger
Director, Commercial Business
Cove Point LNG, LP

Sworn to and subscribed before me this 13th day of March, 2026

Madalyn B. Cauthorne
Notary Public
In and For said City



Appendix B

OPINION OF COUNSEL

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 Cove Point LNG, LP.

I have reviewed the corporate documents of Cove Point LNG, LP and it is my opinion that the proposed export of natural gas is within the company's corporate powers.

Respectfully submitted.

Dennis R. Lane

Dennis R. Lane (Mar 13, 2026 16:17:16 EDT)

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