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

**In The Matter Of:**

Corpus Christi Liquefaction, LLC )  
Corpus Christi Liquefaction Stage IV, LLC )  
Cheniere Marketing, LLC )  
)

**Docket No. 26-\_\_\_-LNG**

**APPLICATION FOR LONG-TERM AUTHORIZATION TO EXPORT LIQUEFIED  
NATURAL GAS TO FREE TRADE AGREEMENT NATIONS AND  
NON-FREE TRADE AGREEMENT NATIONS**

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**APPLICATION FOR LONG-TERM AUTHORIZATION TO EXPORT LIQUEFIED  
NATURAL GAS TO FREE TRADE AGREEMENT NATIONS AND  
NON-FREE TRADE AGREEMENT NATIONS**

Pursuant to Section 3 of the Natural Gas Act (“NGA”)<sup>1</sup> and Part 590 of the U.S. Department of Energy’s (“DOE”) regulations,<sup>2</sup> Corpus Christi Liquefaction, LLC, Corpus Christi Liquefaction Stage IV, LLC, and Cheniere Marketing, LLC (collectively, “Applicants”) hereby request that DOE’s Hydrocarbons and Geothermal Energy Office grant long-term, multi-contract authorization<sup>3</sup> to engage in exports of domestically produced liquefied natural gas (“LNG”) in an amount up to the equivalent of approximately 1,200 billion cubic feet (“Bcf”) of natural gas per year (“Bcf/y”) from the proposed “CCL Stage 4 Project”, an expansion of the existing and approved LNG terminal on the La Quinta Ship Channel in San Patricio and Nueces Counties, Texas (“CCL Terminal”).<sup>4</sup> Applicants request such authorization to export LNG to any country

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<sup>1</sup> 15 U.S.C. § 717b.

<sup>2</sup> 10 C.F.R. Part 590 (2025).

<sup>3</sup> Applicants note that pursuant to the policy statement issued by DOE on December 18, 2020, DOE has established a practice that long-term authorizations to export domestically produced natural gas include additional authority to export the same approved volume pursuant to transactions with terms of less than two years on a non-additive basis (including non-additive commissioning volumes). Including Short-Term Authority in Long-Term Authorizations for the Export of Natural Gas on a Non-Additive Basis, 86 Fed. Reg. 2,243 (Jan. 12, 2021) [hereinafter *Short-Term Policy Statement*].

<sup>4</sup> CCL Terminal means all existing facilities at the LNG terminal and all authorized but not yet constructed facilities approved in Federal Energy Regulatory Commission (“FERC” or “Commission”) Docket Nos. CP12-507-000, as amended in CP19-514-000; CP18-512-000; and CP23-129-000. See *Corpus Christi Liquefaction, LLC & Cheniere Corpus Christi Pipeline, L.P.*, 149 FERC ¶ 61,283 (2014), *reh’g denied*, 151 FERC ¶ 61,098 (2015), *as amended*, 177 FERC ¶ 61,029 (2021) (granting amendment to increase production capacity); *Corpus Christi*

which has, or in the future develops, the capacity to import LNG via ocean going carrier and with which the United States either (i) has a free trade agreement (“FTA”) requiring national treatment for trade in natural gas (“FTA Nations”) or (ii) lacks an FTA requiring national treatment for trade in natural gas but with which trade is not prohibited by U.S. law or policy (“Non-FTA Nations”), on a non-additive basis, each for a term commencing at first commercial export.

Because the CCL Stage 4 Project is not anticipated to commence commissioning of the first of the four proposed LNG trains until early 2032 (with the second, third and fourth trains coming online sequentially thereafter over an approximately three year period), DOE’s recent practice of granting export authorizations from the date of first commercial export through December 31, 2050<sup>5</sup> would result in an export term of less than 20 years for each of the four trains, and thus would not allow sufficient time for both construction of the CCL Stage 4 Project and the completion of a 20-year term for natural gas supply and/or LNG export contracts (as DOE has recognized is standard for LNG terminals). Accordingly, Applicants request DOE grant the export authorization requested herein for a term of 25 years for exports to both FTA and Non-FTA Nations. The requested term would allow for 20-year contracts to be entered into for exports from each proposed train, as commissioning and operation of the four trains is anticipated to occur sequentially over an approximately three-year period.<sup>6</sup> This request is consistent with the

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*Liquefaction Stage III, LLC, Corpus Christi Liquefaction, LLC & Cheniere Corpus Christi Pipeline, LP*, 169 FERC ¶ 61,135 (2019); *Corpus Christi Liquefaction Stage III, LLC, Corpus Christi Liquefaction, LLC & Cheniere Corpus Christi Pipeline, LP*, 179 FERC ¶ 61,087 (2022) (granting an extension of time), *as amended*, Errata Notice, Docket Nos. CP18-512-001 & CP18-513-001 (May 10, 2022), *as further amended*, Errata Notice, Docket Nos. CP18-512-001 & CP18-513-001 (June 13, 2022); *Corpus Christi Liquefaction, LLC & Corpus Christi Liquefaction Stage III, LLC*, 183 FERC ¶ 61,127 (2023) (vacating authorization in part with respect to the addition of one LNG storage tank); *Corpus Christi Liquefaction, LLC & CCL Midscale 8-9, LLC*, 190 FERC ¶ 61,149 (2025), *as amended*, Errata Notice, Docket No. CP23-129-000 (Mar. 20, 2025).

<sup>5</sup> See U.S. Dep’t of Energy, *Extending Natural Gas Export Authorizations to Non-Free Trade Agreement Countries Through the Year 2050*, 85 Fed. Reg. 52,237 (Aug. 25, 2020) (noting the standard export term runs through December 31, 2050) [hereinafter *2050 Policy Statement*].

<sup>6</sup> Construction of the CCL Stage 4 Project is anticipated to be complete by the end of 2034.

administration's goals of ensuring U.S. energy dominance, reducing regulatory burdens, and providing sustained energy security to our trading partners and allies.

The Applicants request this authorization on behalf of themselves and as agent for other entities that may hold title to the LNG at the time of export from the CCL Stage 4 Project. Finally, the Applicants respectfully request that DOE issue the authorizations requested herein without undue delay for the authorization to export to FTA Nations and by no later than May 2027 for the authorization to export to Non-FTA Nations.

In support of the instant application ("Application"), Applicants provide as follows:

**I.**  
**DESCRIPTION OF APPLICANTS**

The exact legal names of the Applicants are Corpus Christi Liquefaction, LLC, Corpus Christi Liquefaction Stage IV, LLC, and Cheniere Marketing, LLC. The Applicants are Delaware limited liability companies, each with a primary place of business located at 845 Texas Avenue, Suite 1250, Houston, TX 77002. The Applicants are registered to do business in the State of Texas, and are wholly owned subsidiaries of Cheniere Energy, Inc. ("Cheniere").

Cheniere is a publicly traded energy company listed on the New York Stock Exchange (NYSE: LNG), which develops and operates LNG terminals, including the CCL Terminal, and natural gas pipelines. Cheniere is headquartered at 845 Texas Avenue, Suite 1250, Houston, TX 77002 and is registered to do business in the State of Texas.

**II.**  
**COMMUNICATIONS AND CORRESPONDENCE**

All correspondence and communications concerning this Application, including all service of pleadings and notices, should be directed to the following persons:<sup>7</sup>

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**III.**  
**EXECUTIVE SUMMARY**

The CCL Terminal has a demonstrated record of providing reliable supplies of LNG to global markets, having produced and exported over 1,300 cargoes of LNG as of March 2026. The CCL Stage 4 Project, which will be constructed and operated as part of the integrated CCL Terminal, is proposed to help meet increased international demand for U.S. natural gas. Increasing the liquefaction and export capacity of the CCL Terminal and leveraging existing supporting

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<sup>7</sup> Applicants request waiver of Section 590.202(a) of DOE's regulations, to the extent necessary to include additional representatives on the official service list in this proceeding. 10 C.F.R. § 590.202(a). Pursuant to Section 590.103(b) of DOE's regulations, Applicants hereby certify that the persons listed in this section and the undersigned are the duly authorized representatives of the Applicants. 10 C.F.R. § 590.103(b).

infrastructure will enable the Applicants to export additional domestic natural gas supplies as LNG while minimizing environmental impacts. LNG exports from the CCL Stage 4 Project will help mitigate reliability concerns for U.S. geopolitical allies and trading partners, and will do so with reduced emissions as compared to other traditional fossil fuels. Moreover, such exports will help diversify global LNG supplies and increase the volumes of destination-flexible LNG available in the international market, thereby further enhancing energy security for many U.S. allies and trading partners. The CCL Stage 4 Project will also improve the U.S. balance of trade and result in the creation of new jobs, local economic stimulus, and increased domestic tax revenues.

For these reasons, and as more fully explained below, authorization to export LNG from the CCL Stage 4 Project is not inconsistent with the public interest. To the contrary, authorization of the Application will serve the public interest. Accordingly, Applicants respectfully request that DOE approve the Application at the earliest possible date and issue the requested authorization to export to FTA Nations without undue delay and the authorization to export to Non-FTA Nations by no later than May 2027.

#### **IV. CCL TERMINAL EXPORT AUTHORIZATIONS**

As noted above, the CCL Stage 4 Project will be interconnected and operated on an integrated basis with the CCL Terminal, which first commenced LNG exports in December 2018 and since that time has exported over 1,300 cargoes of LNG. Indeed, DOE has previously issued a series of orders approving long-term LNG exports from the CCL Terminal, each for a term extending through December 31, 2050, as detailed in the following table:

Docket No(s).	Facilities at the CCL Terminal	Authorization Holder(s)	Destination	Volume
12-97-LNG 12-99-LNG, 19-124-LNG <sup>8</sup>	Large scale LNG trains 1-3	Corpus Christi Liquefaction, LLC and Cheniere Marketing, LLC	FTA and Non- FTA Nations	875.16 Bcf/y
18-78-LNG <sup>9</sup>	Midscale LNG trains 1-7	Corpus Christi Liquefaction, LLC	FTA and Non- FTA Nations	582.14 Bcf/y
23-46-LNG <sup>10</sup>	Midscale LNG trains 8 and 9	Corpus Christi Liquefaction, LLC, CCL Midscale 8-9, LLC & Cheniere Marketing, LLC	FTA and Non- FTA Nations	170 Bcf/y

<sup>8</sup> See *Cheniere Marketing, LLC*, Order Granting Long-Term Multi-Contract Authorization to Export Liquefied Natural Gas by Vessel from the Proposed Corpus Christi Liquefaction Project to Free Trade Agreement Nations, DOE/FE Order No. 3164, FE Docket No. 12-99-LNG (Oct. 16, 2012); *Cheniere Marketing, LLC*, Order Amending Application in Docket No. 12-97-LNG to Add Corpus Christi Liquefaction, LLC as Applicant, and Granting Request in DOE/FE Order No. 3164, Docket No. 12-99-LNG to Add Corpus Christi Liquefaction, LLC as Authorization Holder, DOE/FE Order Nos. 3538 & 3164-A, FE Docket Nos. 12-97-LNG & 12-99-LNG (Oct. 29, 2014); *Cheniere Marketing, LLC & Corpus Christi Liquefaction, LLC*, Final Opinion and Order Granting Long-Term, Multi-Contract Authorization to Export Liquefied Natural Gas by Vessel from the Proposed Corpus Christi Liquefaction Project to Be Located in Corpus Christi, Texas, to Non-Free Trade Agreement Nations, DOE/FE Order No. 3638, FE Docket No. 12-97-LNG (May 12, 2015); *Cheniere Marketing, LLC & Corpus Christi Liquefaction, LLC*, Order Granting Long-Term Authorization to Export Liquefied Natural Gas to Free Trade Agreement Nations, DOE/FE Order No. 4519, FE Docket No. 19-124-LNG (Apr. 14, 2020); *Cheniere Marketing, LLC & Corpus Christi Liquefaction, LLC*, Order Extending Export Term for Authorizations to Free Trade and Non-Free Trade Agreement Nations through December 31, 2050, DOE/FE Order Nos. 3164-B, 3638-B & 4519-A, FE Docket Nos. 12-97-LNG, 12-99-LNG & 19-124-LNG (Oct. 28, 2020); *Cheniere Marketing, LLC & Corpus Christi Liquefaction, LLC*, Order Granting Long-Term Authorization to Export Liquefied Natural Gas to Non-Free Trade Agreement Nations, DOE/FECM Order No. 4799, FE Docket No. 19-124-LNG (Mar. 16, 2022) [hereinafter *Order No. 4799*].

<sup>9</sup> *Corpus Christi Liquefaction Stage III, LLC*, Order Granting Long-Term, Multi-Contract Authorization to Export Liquefied Natural Gas by Vessel from the Proposed Stage 3 LNG Facilities to be Located at the Corpus Christi LNG Terminal in San Patricio and Nueces Counties, Texas, to Free Trade Agreement Nations, DOE/FE Order No. 4277, FE Docket No. 18-78-LNG (Nov. 9, 2018) [hereinafter *Order No. 4277*]; *Corpus Christi Liquefaction Stage III, LLC*, Opinion and Order Granting Long-Term Authorization to Export Liquefied Natural Gas to Non-Free Trade Agreement Nations, DOE/FE Order No. 4490, FE Docket No. 18-78-LNG (Feb. 10, 2020) [hereinafter *Order No. 4490*]; *Corpus Christi Liquefaction Stage III, LLC*, Order Extending Export Term for Authorizations to Free Trade and Non-Free Trade Agreement Nations Through December 31, 2050, DOE/FE Order Nos. 4277-A & 4490-A, FE Docket No. 18-78-LNG (Oct. 21, 2020); *Corpus Christi Liquefaction, LLC*, Order Granting Request to Amend Authorizations to Export Liquefied Natural Gas to Reflect Corporate Reorganization, DOE/FECM Order Nos. 4277-B & 4490-B, Docket No. 18-78-LNG (Aug. 25, 2022).

<sup>10</sup> *Corpus Christi Liquefaction, LLC, CCL Midscale 8-9, LLC & Cheniere Marketing, LLC*, Order Granting Long-Term Authorization to Export Liquefied Natural Gas to Free Trade Agreement Nations, DOE/FECM Order No. 5019, Docket No. 23-46-LNG (Jul. 19, 2023); *Corpus Christi Liquefaction, LLC, CCL Midscale 8-9, LLC & Cheniere Marketing, LLC*, Order Granting Long-Term Authorization to Export Liquefied Natural Gas to Non-Free Trade Agreement Nations, DOE/HGEO Order No. 5391, Docket No. 23-46-LNG (Feb. 26, 2026) [hereinafter *Order No. 5391*].

Additionally, an application is currently pending in Docket No. 26-22-LNG requesting authorization to export additional LNG from midscale LNG trains 1 through 9 at the CCL Terminal to FTA and Non-FTA Nations, in an amount of up to the equivalent of approximately 251 Bcf/y of natural gas.<sup>11</sup>

## **V. PROJECT DESCRIPTION**

On February 3, 2026, Corpus Christi Liquefaction, LLC and Corpus Christi Liquefaction Stage IV, LLC filed an application with FERC for authorization to site, construct and operate the CCL Stage 4 Project in Docket No. CP26-82-000 (“Stage 4 FERC Application”).<sup>12</sup> The proposed CCL Stage 4 Project, which will be located on land currently owned by Cheniere Land Holdings, LLC (“CLH”),<sup>13</sup> includes the addition of four liquefaction trains, two LNG storage tanks, three ground flares, a third marine berth, a terminal supply line, and other associated infrastructure. The CCL Stage 4 Project will have the capacity to produce LNG for export in a volume up to the equivalent of approximately 1,200 Bcf per year of natural gas.<sup>14</sup>

As part of the Stage 4 FERC Application, Cheniere Corpus Christi Pipeline, L.P. (“CCPL”), an affiliate of the Applicants, concurrently requested in Docket No CP26-87-000 that the Commission issue a certificate of public convenience and necessity authorizing CCPL to expand its existing pipeline system in San Patricio County, Texas (“CCPL Expansion Project”), to

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<sup>11</sup> See *Corpus Christi Liquefaction, LLC, CCL Midscale 8-9, LLC & Cheniere Marketing, LLC*, Application for Long-Term Authorization to Export Liquefied Natural Gas to Free Trade Agreement Nations and Non-Free Trade Agreement Nations, Docket No. 26-22-LNG (Mar. 2, 2026).

<sup>12</sup> *Corpus Christi Liquefaction, LLC, et al.*, Application for Authorizations Under the Natural Gas Act and Amendment of Certificate Authorization, Docket Nos. CP26-82-000, *et al.* (Feb. 3, 2026).

<sup>13</sup> CLH is an affiliate of the Applicants and is a wholly-owned subsidiary of Cheniere. Applicants and CLH are under common control through Cheniere, their ultimate corporate parent. In this regard, CLH and the Applicants anticipate entering into any agreements, as may be necessary, to allow Applicants to construct and operate the Project after permitting is complete.

<sup>14</sup> Approximate equivalent of 24 million tonnes per annum of LNG.

provide feed gas on an integrated basis to the CCL Terminal and to support the CCL Stage 4 Project.

Corpus Christi Liquefaction, LLC, Corpus Christi Liquefaction Stage IV, LLC and CCPL (together, the “FERC Applicants”), have requested that the Commission grant all authorizations required to site, construct, and operate the CCL Stage 4 Project and the CCPL Expansion Project (together the “Projects”), by no later than May 2027.<sup>15</sup> Timely authorization by FERC and DOE is required so that the facilities may be placed in-service and exports may commence as soon as possible. The Commission issued notice of the Stage 4 FERC Application on February 17, 2026.<sup>16</sup>

## **VI. AUTHORIZATION REQUESTED**

Pursuant to Section 3 of the NGA, the Applicants hereby respectfully request authorization to engage in exports from the CCL Stage 4 Project of domestically produced LNG in an amount up to the equivalent of approximately 1,200 Bcf of natural gas per year, via ocean going carrier to FTA Nations and Non-FTA Nations (on a non-additive basis), each commencing at first commercial export from the CCL Stage 4 Project and continuing for a term of 25 years.

Applicants request authorization to engage in such exports both on their own behalf, and as agent for other parties who may hold title to the LNG at the time of export. Applicants will comply with all DOE/FECM requirements for exporters and agents, including the registration requirements as first established in DOE/FE Order No. 2913.<sup>17</sup>

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<sup>15</sup> The FERC Applicants requested that the Commission allow ten years from the date of the authorization order for the FERC Applicants to complete construction and place the Projects’ facilities in service to account for any construction schedule delays.

<sup>16</sup> *Corpus Christi Liquefaction Stage IV, LLC, et al.*, Notice of Application and Establishing Intervention Deadline, Docket Nos. CP26-82-000, *et al.* (Feb. 17, 2026).

<sup>17</sup> *Freeport LNG Expansion, L.P. & FLNG Liquefaction, LLC*, Order Granting Long-Term Authorization to Export Liquefied Natural Gas from Freeport LNG Terminal to Free Trade Nations, DOE/FE Order No. 2913, FE Docket No. 10-160-LNG, at 9-10 (Feb. 10, 2011).

As noted above, because the CCL Stage 4 Project is not anticipated to commence commissioning until early 2032, DOE’s recent practice of granting export authorizations through December 31, 2050 would result in terms of less than 20 years for the export authorizations requested herein, which is contrary to the administration’s goals of ensuring U.S. energy dominance, reducing regulatory burdens and providing sustained energy security to our trading partners and allies. Consistent with administration policy favoring exports, Applicants are requesting a 25-year export term to allow time for both construction of the CCL Stage 4 Project<sup>18</sup> and the completion of a standard 20-year term for a natural gas supply contract and/or an LNG export contract for exports from all proposed trains,<sup>19</sup> as commissioning and commencement of operations of the four proposed trains is anticipated to occur sequentially over an approximately three-year period.

In issuing authorizations to export LNG to Non-FTA Nations for a 20-year term, DOE explained that “LNG export facilities are capital intensive and that, to obtain financing for such projects, there must be a reasonable expectation that the authorization will continue for a term sufficient to support repayment.”<sup>20</sup> As explained above, exports from the first train at the CCL Stage 4 Project are not anticipated to commence until 2032. Therefore, the generally applicable term through December 31, 2050, has the potential to result in a term of less than 20-years for the Applicants’ authorization to engage in exports to Non-FTA Nations, which would be contrary to

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<sup>18</sup> The proposed export term accounts for the potential for delays associated with the construction and commissioning of each of the four trains.

<sup>19</sup> Allowing applicants sufficient time to enter into such 20-year contracts is consistent with historic DOE policy. *See Port Arthur LNG Phase II, LLC*, Order Amending Long-Term Authorization to Export Liquefied Natural Gas to Non-Free Trade Agreement Nations, DOE/FECM Order No. 5292-A, Docket No. 20-23-LNG, at 4-5 (June 30, 2025) [hereinafter *Order No. 5292-A*].

<sup>20</sup> *See Freeport LNG Expansion, L.P., et al.*, Final Opinion and Order Granting Long-Term, Multi-Contract Authorization to Export Liquefied Natural Gas by Vessel from the Freeport LNG Terminal on Quintana Island, Texas, to Non-Free Trade Agreement Nations, DOE/FE Order No. 3282-C, FE Docket No. 10-161-LNG, at 89 (Nov. 14, 2014).

DOE's reasoning – not only in the 2050 Policy Statement but also in its prior adoption of 20-year terms. A term of less than 20-years would put the Applicants at a commercial disadvantage, particularly in competition with LNG producers elsewhere in the world, would be inconsistent with the economic life of the new CCL Stage 4 Project facilities, and could present financing challenges. Moreover, DOE policy has previously provided support for terms longer than requested herein. As explained in the 2050 Policy Statement:

a 30-year export term would better match the operational life of LNG export facilities, which are typically designed for a service life of 30 to 50 years. A 30-year export term thus would provide authorization holders with greater security in financing their export facility and would maximize their ability to enter into natural gas supply and export contracts for a longer period of time... and a 30-year export term would benefit U.S. authorization holders as they compete for long-term export contracts in the global market.<sup>21</sup>

Current DOE policies further support not only the requested 25-year term duration but also recognize that LNG exports, such as those proposed herein, are fully consistent with the public interest. DOE recently made a determination that “it is in the public interest under NGA Section 3(a) – as well as consistent with Executive Order 14154, *Unleashing American Energy* [(“E.O. 14154”)], ... to allow ... [an authorization holder] to export the approved volume of LNG from [a project] ***beyond December 31, 2050...***”<sup>22</sup> In this regard, DOE stated that:

[a]t the time DOE issued the 2050 Policy Statement, DOE considered an export term extending through December 31, 2050, ***to be sufficient to allow time for both construction of the associated LNG export facility and the completion of a standard 20-year term for a natural gas supply contract and/or a LNG export contract.*** With the passage of time since the 2050 Policy Statement was implemented, however, a standard 20-year contract now could extend beyond December 31, 2050.<sup>23</sup>

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<sup>21</sup> 2050 Policy Statement, at 52,240.

<sup>22</sup> Order No. 5292-A, at 3-4.

<sup>23</sup> *Id.* at 4-5.

Under such circumstances, an authorization holder “would not be able to fulfill a standard 20-year contract to export the volume of LNG to non-FTA countries that DOE has already approved—and that DOE found is ‘likely to yield economic benefits to the United States, diversify global LNG supplies, and improve energy security for U.S. allies and trading partners over the course of the export term.’”<sup>24</sup> This rationale for allowing exports beyond December 31, 2050 is equally applicable to, and further supportive of, the Applicants’ request herein for an export term of 25 years.

Finally, consistent with the Short-Term Policy Statement, Applicants request that the authorizations issued include authority for the Applicants to export the same approved volume pursuant to transactions with terms of less than two years on a non-additive basis (including commissioning volumes).

## **VII. COMMERCIAL TERMS AND EXPORT SOURCES**

Feed gas for the CCL Stage 4 Project will be transported to the proposed facilities by a combination of the previously permitted CCPL pipeline facilities, the CCPL Expansion Project, and intrastate pipeline facilities. Through these multiple interconnections, the CCL Stage 4 Project will have access to natural gas supplies from almost any point on the U.S. interstate pipeline grid through direct delivery or by displacement, as DOE has previously confirmed in relation to the

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<sup>24</sup> *Id.* at 5; *see also Order No. 5391*, at 58 (authorizing three-year make-up period); *Commonwealth LNG, LLC*, Final Order Granting Long-Term Authorization to Export Liquefied Natural Gas to Non-Free Trade Agreement Nations, DOE/FECM Order No. 5238-A, Docket No. 19-134-LNG, at 48 (Aug. 29, 2025) (authorizing same); *Venture Global CP2 LNG, LLC*, Final Order Granting Long-Term Authorization to Export Liquefied Natural Gas to Non-Free Trade Agreement Nations, DOE/FECM Order No. 5264-A, Docket No. 21-131-LNG, at 68 (Oct. 21, 2025) (authorizing same) [hereinafter *Order No. 5264-A*].

CCL Terminal.<sup>25</sup> In this regard, the specific source of feed-gas for the CCL Stage 4 Project is not presently known and is likely to change over the life of the project.

Because the CCL Stage 4 Project will be operated on an integrated basis as part of the CCL Terminal, the export authorization requested herein will be utilized in conjunction with a portfolio of long-term LNG export contracts associated with the CCL Terminal. To the extent additional long-term agreements are signed, Applicants will submit transaction-specific information (e.g., long-term supply agreements and long-term export agreements) at that time, and request that DOE make a similar finding to that in Order No. 5391 with regard to the transaction-specific information requested in Section 590.202(b) of DOE's regulations.<sup>26</sup>

The Applicants will file—or cause to be filed—either unredacted contracts, or long-term contracts under seal, with either: (i) a copy of each long-term contract with commercially sensitive information redacted, or (ii) a summary of all major provisions of the contracts including, but not limited to, the parties to each contract, contract term, quantity, any take-or-pay or equivalent provisions/conditions, destinations, re-sale provisions, and other relevant provisions.

## **VIII. APPLICABLE LEGAL STANDARD**

Applicants' request for authorization to engage in exports to FTA Nations must be reviewed under Section 3(c) of the NGA. Section 3(c) states, in relevant part:

... 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

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<sup>25</sup> See *Order No. 5391*, at 25.

<sup>26</sup> 10 C.F.R. § 590.202(b); see also *Order No. 5391*, at 60-61.

be consistent with the public interest, and applications for such ... exportation shall be granted without modification or delay.<sup>27</sup>

Thus, Applicants need not provide any additional support to DOE for their request to engage in exports to FTA Nations, as such exports are deemed consistent with the public interest.

Applicants' request for authorization to engage in exports to Non-FTA Nations must be reviewed under Section 3(a) of the NGA. While the same statutory mandate with regard to exports to FTA Nations does not apply to exports to Non-FTA Nations, Section 3(a) does, however, require a presumption in favor of approval of such exports.<sup>28</sup> Section 3(a) of the NGA provides that, DOE "shall issue" an order for exports "unless ... it finds that the proposed exportation ... will not be consistent with the public interest."<sup>29</sup> Pursuant to the forgoing, and as discussed below, the authorizations requested herein should be granted pursuant to Section 3 of the NGA.

## **IX. PUBLIC INTEREST**

Despite the clear presumption under NGA Section 3(a) favoring export authorizations and the broad public interest standard, "public interest" is not defined in the statute, nor are specific criteria identified that must be considered. DOE historically has referred to the principles established in its 1984 Policy Guidelines<sup>30</sup>—minimizing federal control and involvement in energy

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<sup>27</sup> 15 U.S.C. § 717b(c).

<sup>28</sup> See, e.g., *Sierra Club v. DOE*, 134 F.4th 568, 572-73 (D.C. Cir. 2025) (recognizing the "public interest" standard in Section 3(a) was structured with "a presumption favoring export applications"); *Sierra Club v. DOE*, 867 F.3d 189, 203 (D.C. Cir. 2017) (observing the D.C. Circuit has read Section 3(a) to contain a presumption in favor of export authorization, and has required an affirmative showing of inconsistency with the public interest to deny an application).

<sup>29</sup> 15 U.S.C. § 717b(a).

<sup>30</sup> U.S. Dep't of Energy, New Policy Guidelines and Delegation Orders From Secretary of Energy to Economic Regulatory Administration and Federal Energy Regulatory Commission Relating to the Regulation of Imported Natural Gas, 49 Fed. Reg. 6684 (Feb. 22, 1984) [hereinafter *1984 Policy Guidelines*].

markets and promotion of a balanced and mixed energy resource system.<sup>31</sup> The 1984 Policy Guidelines and DOE Delegation Order No. 0204-111 established the domestic need for the gas as the primary factor weighing on the public interest.<sup>32</sup> Recent precedent still relies on the 1984 Policy Guidelines, but also takes a broader approach, and focuses on four primary factors: “(i) the domestic need for the LNG proposed to be exported, (ii) whether the proposed exports pose a threat to the security of domestic natural gas supplies, (iii) whether the arrangement is consistent with DOE’s policy of promoting market competition, and (iv) any other factors bearing on the public interest as determined by DOE”, such as international and environmental impacts.<sup>33</sup> Additionally, in E.O. 14154, the President directed that in evaluating the public interest of LNG exports, 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.”<sup>34</sup>

### ***Domestic Need and Security of Natural Gas Supply***

Current projections for both domestic gas supply, as well as consumption, support the assertion that the proposed LNG exports from the CCL Stage 4 Project are not inconsistent with the public interest. U.S. gas supply conditions are more than adequate to satisfy both domestic needs and exports of LNG, including those proposed herein.

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<sup>31</sup> See, e.g., *Order No. 5391*, at 21; *Phillips Alaska Natural Gas Corp. & Marathon Oil Co.*, Order Extending Authorization to Export Liquefied Natural Gas from Alaska, DOE/FE Opinion and Order No. 1473, FE Docket No. 96-99-LNG, at 14 (Apr. 2, 1999).

<sup>32</sup> DOE Delegation Order No. 0204-111 (Feb. 22, 1984). Although DOE Delegation Order No. 0204-111 was later rescinded by DOE Delegation Order No. 00-002.00 (¶ 2) (Dec. 6, 2001), and DOE Redelegation Order No. 00-002.04 (¶ 2) (Jan. 8, 2002) and is no longer in effect, DOE has continued to emphasize the domestic need for natural gas within the range of factors that it evaluates when reviewing an application for export authorization, consistent with the order. See *Order No. 5391*, at 21, n.100.

<sup>33</sup> *Order No. 5391*, at 22.

<sup>34</sup> Exec. Order No. 14154, *Unleashing American Energy*, 90 Fed. Reg. 8,353 (Jan. 29, 2025).

DOE has affirmed that “market forces work to match supply and demand, such that enough natural gas would be produced to satisfy U.S. demand regardless of export levels, given the very large American resource base.”<sup>35</sup> In this regard, DOE has noted that one of the primary conclusions of the *2024 LNG Export Study: Energy, Economic, and Environmental Assessment of U.S. LNG Exports* (“2024 Study”)<sup>36</sup> is that “domestic natural gas supply is sufficient to meet both domestic demand and the modeled global demand for U.S. LNG in all scenarios, including sensitivity scenarios on U.S. oil and gas supply.”<sup>37</sup> The Response to Comments further noted that “having a domestic industry in place poised to supply both U.S. and export demand for natural gas only strengthens domestic energy security, as the industry would be prepared to meet potential elevated domestic consumption as well as supply exports.”<sup>38</sup> The latest Short-Term Energy Outlook (“STEO”) produced by the U.S. Energy Information Administration (“EIA”) in March 2026 further supports these conclusions. EIA stated that it expects “marketed natural gas production to average 121 Bcf per day (Bcf/d) this year, an increase of 2% from 2025” and that natural gas production will “rise[] by an additional 3% in 2027 to reach 124 Bcf/d.”<sup>39</sup> The March STEO further notes that “[t]he 2027 forecast is almost 2 Bcf/d higher than last month’s outlook.”<sup>40</sup>

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<sup>35</sup> U.S. Dep’t of Energy, Office of Fossil Energy & Carbon Management, *Energy, Economic, and Environmental Assessment of U.S. LNG Exports: Response to Comments*, at 43 (May 19, 2025) [hereinafter *Response to Comments*].

<sup>36</sup> U.S. Dep’t of Energy, Office of Fossil Energy & Carbon Management, *Energy, Economic, and Environmental Assessment of U.S. LNG Exports* (Dec. 17, 2024).

<sup>37</sup> *Response to Comments*, at 47.

<sup>38</sup> *Id.* at 43.

<sup>39</sup> U.S. Energy Info. Admin., *Short-Term Energy Outlook – March 2026*, at 3 (Mar. 9, 2026), available at <https://www.eia.gov/outlooks/steo/archives/mar26.pdf>.

<sup>40</sup> *Id.*

EIA also indicated in the March STEO that total natural gas consumption is anticipated to remain relatively flat in both 2026 and 2027 compared to 2025.<sup>41</sup>

Moreover, DOE has repeatedly affirmed that the level of LNG exports to date has not demonstrated a “consistent effect” on domestic natural gas prices, but that “any domestic price impact is expected to be minimal *due to the abundant U.S. supply of natural gas*.”<sup>42</sup> One of DOE’s “key findings” from the 2024 Study was that “increased LNG exports are projected to have relatively modest impacts on prices” and “the potential price impacts from increased LNG exports modeled in the 2024 Study are within the range of prices observed over the past five years....”<sup>43</sup> DOE further has held that granting additional exports to Non-FTA Nations is “unlikely to adversely affect the availability of natural gas supplies to domestic consumers or result in natural gas price increases to the extent that they would negate the economic benefits to the United States.”<sup>44</sup>

#### ***Economic Benefits of the CCL Stage 4 Project and LNG Exports***

As confirmed in DOE’s key findings from the 2024 Study “[i]ncreasing U.S. LNG exports increases U.S. [gross domestic product].”<sup>45</sup> Moreover, DOE has concluded, when previously approving exports from the CCL Terminal to Non-FTA Nations, that the “United States will experience net economic benefits from the issuance of authorizations to export domestically produced LNG”, including from the CCL Terminal.<sup>46</sup> As the Wall Street Journal recently noted,

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<sup>41</sup> *Id.* at tbl. 5a (U.S. Natural Gas Supply, Consumption, and inventories).

<sup>42</sup> *Response to Comments*, at 48 (emphasis added).

<sup>43</sup> *Id.* at 46-47.

<sup>44</sup> *See, e.g., Port Arthur LNG Phase II, LLC*, Order Granting Long-Term Authorization to Export Liquefied Natural Gas to Non-Free Trade Agreement Nations, DOE/FECM Order No. 5292, Docket No. 20-23-LNG, at 4 (May 29, 2025); *see also Order No. 5391*, at 7.

<sup>45</sup> *Response to Comments*, at 46.

<sup>46</sup> *See, e.g., Order No. 4799*, at 45.

“U.S. LNG exports now total about \$150 million in sales a day, providing a major economic boost that has benefited businesses across the U.S. supply chain.”<sup>47</sup>

In this regard, producing and exporting LNG at the CCL Stage 4 Project will provide the United States with significant benefits, including stimulating the local, regional, and national economies through direct job creation, purchases of goods and services, wages, increased economic activity and tax revenues. When construction is at its peak, the Projects expect to employ over 8,000 workers, and during operations, the Projects anticipate adding approximately 311 permanent jobs. Construction and operation of the proposed Projects will generate significant economic benefits for local communities in the vicinity of the Projects through direct expenditures for materials and services, payroll income, and sales and use tax revenues. Construction workers will also spend money locally on goods and services, which will generate sales and use tax revenues. Once in service, the Projects will generate additional annual ad valorem or property tax revenues.

Specifically, as noted in the Stage 4 FERC Application,<sup>48</sup> the Projects will have an estimated total direct construction spend, including payroll, of \$283.6 million per month in the United States. Total material purchases within San Patricio, Aransas, and Nueces counties, Texas are expected to be approximately \$3.88 billion. These expenditures, along with spending on goods and services in the region, will generate economic activity and support employment and income in the local economy and elsewhere in the economy through the multiplier effect. The total direct,

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<sup>47</sup> The Editorial Board, *U.S. LNG Exports to the World's Rescue*, WALL STREET JOURNAL (Mar. 2, 2026), available at [https://www.wsj.com/opinion/american-lng-exports-middle-east-iran-cheniere-energy-2c3fd6ad?gaa\\_at=eafs&gaa\\_n=AWetsqdQtzQUQ8EaPkPzCA2URt0AfAI-7IBqMpHTSYco-ldBib29x6Wa7e73&gaa\\_ts=69af83a4&gaa\\_sig=aoP23m5f4quo9B2FFc88QWN71is8BytTxPcrZpbAwfAyeMzpr5RFNfNHsNZSNqD4H96h917KDHFUFUZ12f18h0Q%3D%3D](https://www.wsj.com/opinion/american-lng-exports-middle-east-iran-cheniere-energy-2c3fd6ad?gaa_at=eafs&gaa_n=AWetsqdQtzQUQ8EaPkPzCA2URt0AfAI-7IBqMpHTSYco-ldBib29x6Wa7e73&gaa_ts=69af83a4&gaa_sig=aoP23m5f4quo9B2FFc88QWN71is8BytTxPcrZpbAwfAyeMzpr5RFNfNHsNZSNqD4H96h917KDHFUFUZ12f18h0Q%3D%3D).

<sup>48</sup> *Stage 4 FERC Application*, at Exh. F/F-I, Resource Report 5, at pp. 5-9 – 5-10.

indirect, and induced monthly spending in the Corpus Christi area during construction of the Projects is expected to be \$318.0 million.

Additionally, once the Projects are operational, the approximately 311 new permanent jobs are anticipated to result in an increase of \$612.4 million annually in gross product in the Corpus Christi area, and annual federal and Texas state income taxes of approximately \$144.7 million and \$35.8 million, respectively. Over the first 25 years of operations, the Projects are expected to result in a gross product increase of \$20.6 billion across the United States, including \$14.7 billion in the Corpus Christi area.

***Alignment with U.S. Policy: Global Security and Trade Benefits***

The CCL Stage 4 Project will also have significant global security and trade benefits including promoting liberalization of the global natural gas trade through fostering of a liquid global LNG market, advancing national security and the security of U.S. allies through diversification of global natural gas supplies, increasing economic trade and ties with foreign nations, thus improving the U.S. balance of trade, and displacing fuels with more significant environmental impacts in foreign countries. Geopolitical tensions, and the recent energy crisis in Europe, all have led to an increased demand for more natural gas and, thus, demonstrate the need for investments in natural gas and LNG infrastructure, while supporting the growth and jobs associated with exports domestically. It has also been noted that U.S. LNG exports “helped Europe wean itself from Russian gas after Vladimir Putin’s invasion of Ukraine in early 2022” and that “U.S. [LNG] exports are now poised to mitigate supply disruptions caused by the war with Iran.”<sup>49</sup>

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<sup>49</sup> See The Editorial Board, *supra* n.47 (further noting that “Europe’s share of U.S. LNG exports have doubled to 68% since the [Russia-Ukraine] war began” and that “American exports have reduced Europe’s vulnerability to Middle East supply shocks.”).

In approving additional exports in the last year, DOE held “non-FTA exports are likely to yield economic benefits to the United States, diversify global LNG supplies, and improve energy security for U.S. allies and trading partners over the course of the export term.”<sup>50</sup> In this regard, the 2024 Study noted “[a]s LNG re-gasification and associated import infrastructure is built out globally, increasing U.S. LNG exports could enhance global energy security. Most U.S. LNG contracts include a destination flexibility clause in which the buyer can deliver LNG to any destination, if it complies with DOE export authorizations and U.S. law. Accordingly, U.S. LNG goes to where the global market most demands it.”<sup>51</sup> Furthermore, in the Response to Comments, DOE confirmed that “[h]igher levels of U.S. LNG exports will have a beneficial impact on the U.S. trade balance.”<sup>52</sup>

Moreover, approving the exports proposed in the instant Application is consistent with the energy and trade policies of the current administration. Energy Secretary Chris Wright has affirmed the administration’s support for increased exports, stating “President Trump was given a mandate to unleash American energy dominance, and that includes U.S. LNG exports...The facts are clear: expanding America’s LNG exports is good for Americans and good for the world.”<sup>53</sup> Additionally, at the GasTech conference in Milan in Fall 2025, Secretary Wright further noted that the U.S. “will double the natural gas exports from where they are today in the next four or five years”<sup>54</sup> and emphasized in his 2025 conversation with the Council on Foreign Relations that “this

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<sup>50</sup> *Order No. 5391*, at 7.

<sup>51</sup> *Response to Comments*, at 48; *see also 2024 Study*, at 43.

<sup>52</sup> *Response to Comments*, at 46, 47-48.

<sup>53</sup> U.S. Dep’t of Energy, *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>.

<sup>54</sup> Carolyn Davis, *U.S. ‘Building Confidence’ as World’s Most Reliable LNG Supplier, Says DOE Chief*, NATURAL GAS INTELLIGENCE (Sept. 17, 2025), <https://naturalgasintel.com/news/us-building-confidence-as-worlds-most-reliable-lng-supplier-says-doe-chief>.

is a way to get European allies off Russian gas.”<sup>55</sup> Secretary Wright has further asserted that DOE aims “to build confidence the U.S. will continue to grow our LNG exports and we will be a reliable supplier [of LNG].”<sup>56</sup> Just this February, while speaking at the French Institute of International Relations in Paris, Secretary Wright indicated that the U.S. could increase natural gas production to levels that would allow increased exports from the U.S. to Europe and Asia, stating that “the only limit on natural gas is the ability to move it”.<sup>57</sup>

Similarly, as Kyle Haustveit, Assistant Secretary of the Hydrocarbons and Geothermal Energy Office, recently noted, the “administration is redefining what it means to unleash American energy by approving record new LNG exports,” and such exports “will enable secure and reliable American energy access for our allies and trading partners, while also providing well-paid jobs and economic opportunities at home.”<sup>58</sup> The continued recognition of the important benefits of U.S. LNG exports bolsters the conclusion that increasing the availability of U.S. LNG supply in the global market is in the public interest.

### ***Prior Approvals for Exports from the CCL Terminal***

Finally, DOE has repeatedly confirmed that exports to Non-FTA Nations from the CCL Terminal are not inconsistent with the public interest, and a substantial record in support of such

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[reliable-lng-supplier-says-doe-chief/](#); Guarav Sharma, *Trump’s Top Envoys Tell Europe U.S. Will Double Gas Exports in 5 Years*, FORBES (Sept. 11, 2025), <https://www.forbes.com/sites/gauravsharma/2025/09/11/trumps-top-envoys-tell-europe-us-will-double-gas-exports-in-5-years/>.

<sup>55</sup> *A Conversation With U.S. Secretary of Energy Chris Wright*, COUNCIL ON FOREIGN RELATIONS (Sept. 5, 2025), available at <https://www.cfr.org/event/conversation-us-secretary-energy-chris-wright>.

<sup>56</sup> *Id.*

<sup>57</sup> Rosemary Griffin, *US committed to supplying cheap gas to Europe: Wright*, PLATTS GAS DAILY, at 5 (Feb. 17, 2026).

<sup>58</sup> U.S. Dep’t of Energy, Hydrocarbons and Geothermal Energy Office, *Energy Department Approves Final Export Authorization for Venture Global CP2 LNG* (Oct. 21, 2025), available at <https://www.energy.gov/hgeo/articles/energy-department-approves-final-export-authorization-venture-global-cp2-lng>.

exports was developed in those proceedings.<sup>59</sup> The Applicants hereby incorporate by reference the record developed in Docket Nos. 12-97-LNG, 12-99-LNG, 18-78-LNG, 19-124-LNG, and 23-46-LNG.

## **X. ENVIRONMENTAL CONSIDERATIONS**

### ***Project Specific Impacts***

FERC, the lead agency under the National Environmental Policy Act of 1969 (“NEPA”),<sup>60</sup> will review any potential environmental impacts of the CCL Stage 4 Project in its environmental assessment (“EA”) or environmental impact statement (“EIS”), in accordance with both the Energy Policy Act of 2005 and the NGA.<sup>61</sup> DOE is anticipated to participate as a cooperating agency in FERC’s environmental review process for the CCL Stage 4 Project, and thus will be afforded the opportunity to review and comment on the environmental documentation filed with the Commission by the applicants, as well as the EA or EIS. Applicants believe that this approach is sufficient to comply with NEPA.

As further detailed in the Environmental Report submitted with the Stage 4 FERC Application as Exhibit F/F-I, the environmental impacts of the CCL Stage 4 Project will be minimal, and any potential adverse impacts will be avoided or adequately mitigated. Corpus Christi Liquefaction, LLC and Corpus Christi Liquefaction Stage IV, LLC are minimizing the CCL Stage 4 Project’s environmental impacts by significantly limiting greenfield construction. The CCL Stage 4 Project will be located largely within areas previously authorized by the Commission for the construction and operation of the CCL Terminal and an area adjacent to the

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<sup>59</sup> *Supra* nn.8-10.

<sup>60</sup> 42 U.S.C. §§ 4321 *et seq.*

<sup>61</sup> 15 U.S.C. § 717b(e); 15 U.S.C. § 717n(b)(1).

CCL Terminal, which was previously used for an industrial facility. This will result in far less environmental impact than if the CCL Stage 4 Project were proposed on an undeveloped site.

### ***Categorical Exclusion***

To comply with NEPA, the Applicants contend that DOE should rely on a categorical exclusion from the requirement to prepare an environmental impact statement or environmental assessment for the Application. Specifically, categorical exclusion B5.7, Export of Natural Gas and Associated Transportation by Marine Vessel,<sup>62</sup> is directly applicable to the instant request for export authorization. As DOE has noted, the language in the B5.7 categorical exclusion was intended to “focus exclusively on the analysis of potential environmental impacts resulting from activities occurring at or after the point of export, which are within the scope of DOE’s export authorization authority under the NGA” and DOE has determined that “[s]uch impacts begin at the point of export and are limited to the marine transport effects.”<sup>63</sup> In this regard, the Applicants incorporate by reference DOE’s Marine Transport Technical Support Document, which concluded that “the transport of natural gas by marine vessels adhering to applicable maritime safety regulations and established shipping methods and safety standards normally does not pose the potential for significant environmental impacts.”<sup>64</sup>

For the foregoing reasons, the Applicants respectfully submit that the LNG exports proposed herein are not inconsistent with, and clearly serve, the public interest.

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<sup>62</sup> 10 C.F.R. Part 1021, Subpart. D, App. B, Categorical Exclusion B5.7.

<sup>63</sup> U.S. Dep’t of Energy, National Environmental Policy Act Implementing Procedures, Final Rule, 85 Fed. Reg. 78,197, 78,197 (Dec. 4, 2020); U.S. Dep’t of Energy, Technical Support Document, Notice of Final Rulemaking, National Environmental Policy Act Implementing Procedures (10 C.F.R. Part 1021) (Nov. 2020) [hereinafter *Marine Transport Technical Support Document*]; see also *Order No. 5264-A*, at 55-56 (noting DOE has “determined that transport of natural gas by marine vessel normally does not pose the potential for significant environmental impacts”).

<sup>64</sup> 85 Fed. Reg. at 78,200; see also *Order No. 5391*, at 12 & 48.

**XI.  
APPENDICES**

Appendix A: Verification

Appendix B: Opinion of Counsel

**XII.  
CONCLUSION**

WHEREFORE, the Applicants respectfully request that DOE issue the authorizations requested herein, and any waivers deemed necessary, without undue delay for authorization to export LNG to FTA Nations, and by no later than May 2027 for authorization to export LNG to Non-FTA Nations.

Respectfully submitted,

/s/Lisa M. Tonery

Lisa M. Tonery

Mariah T. Johnston

Jacob I. Cunningham

*Orrick, Herrington & Sutcliffe LLP*

*Attorneys for Corpus Christi Liquefaction, LLC,  
Corpus Christi Liquefaction Stage IV, LLC &  
Cheniere Marketing, LLC*

Dated: March 19, 2026

**APPENDIX A**

VERIFICATION

**VERIFICATION**

State of Texas )

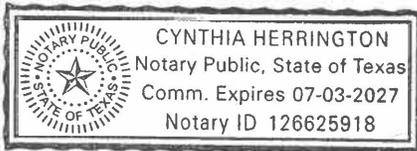
County of Harris )

BEFORE ME, the undersigned authority, on this day personally appeared Florian Pintgen, who, having been by me first duly sworn, on oath says that he is Vice President, Commercial Operations, for Cheniere Energy, Inc. and is duly authorized to make this Verification; that he has read the foregoing instrument and that the facts therein stated are true and correct to the best of his knowledge, information, and belief.



Florian Pintgen  
Vice President, Commercial Operations

SWORN TO AND SUBSCRIBED before me on the 19<sup>th</sup> day March, 2026.



Name: Cynthia Herrington

Title: Notary Public

My Commission expires: 07-03-2027

**APPENDIX B**

OPINION OF COUNSEL



February 24, 2026

U.S. Department of Energy  
Hydrocarbons and Geothermal Energy Office  
Office of Global Energy Security (EX-34)  
1000 Independence Avenue, S.W.  
Washington, D.C. 20585

**RE: Corpus Christi Liquefaction, LLC, Corpus Christi Liquefaction Stage IV, LLC & Cheniere Marketing, LLC  
Docket No. 26-\_\_\_-LNG  
Application for Long-Term Authorization to Export LNG**

Dear Sir or Madam:

This opinion of counsel is provided in accordance with the requirements of section 590.202(c) of the U.S. Department of Energy's regulations, 10 C.F.R. § 590.202(c) (2025). I have examined the Limited Liability Company Agreements of Corpus Christi Liquefaction, LLC, Corpus Christi Liquefaction Stage IV, LLC, and Cheniere Marketing, LLC ("Applicants") and other authorities as necessary, and have concluded that the proposed exportation of liquefied natural gas is within the Applicants' corporate powers.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "S. Markowitz", written over a horizontal line.

By Sean Markowitz  
Executive Vice President, Chief Legal Officer, and Corporate Secretary  
Cheniere Energy, Inc.  
845 Texas Ave., Suite 1250  
Houston, TX 77002  
Phone: (713) 375-5000  
Fax: (713) 375-6000