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

Carib Energy (USA) LLC)

Docket No. 26-____-LNG

**APPLICATION OF CARIB ENERGY (USA) LLC FOR BLANKET 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”)¹ and Part 590 of the Department of Energy’s (“DOE”) regulations², Carib Energy (USA) LLC (“Carib Energy”), a company incorporated in the State of Delaware, hereby requests that DOE’s Office of Global Energy Security (“DOE/OGES”) issue an order granting blanket authorization for Carib Energy to export Liquefied Natural Gas (“LNG”) to Free Trade Agreement (“FTA”) nations and to make small-scale exports of LNG to non-FTA nations. More specifically, Carib Energy requests authorization to export up to 7.3 Bcf of LNG annually – 14.6 Bcf over the requested two-year term – either previously imported into Puerto Rico from foreign sources or received from sources within the United States to (i) any country with which the United States has, or in the future may enter into, a free trade agreement requiring national treatment for trade in natural gas, and (ii) any country with which the United States does not have a free trade agreement requiring national treatment for trade in natural gas, which currently has or in the future develops the capacity to import LNG and with which trade is not prohibited by United States law or policy.

Carib Energy would export LNG from the Crowley LNG Puerto Rico Truck

¹ 15 U.S.C. §717b (a) and (c) (2018).

² 10 C.F.R. Part 590 (2023).

Loading Facility in Peñuelas, Puerto Rico (“Crowley Facility”) to (i) Barbados, the Dominican Republic, Antigua and (ii) any other FTA and non-FTA country in the Caribbean, Central America or South America that either has or develops the capacity to import LNG and with which trade is not prohibited by U.S. law or policy. Carib Energy would make these LNG exports either via approved IMO7/TVAC-ASME containers transported on ocean-going vessels or via small-scale LNG vessels.

As discussed below, Carib Energy’s proposed LNG exports to FTA countries are deemed in the public interest pursuant to NGA Section 3(c). Carib Energy’s application to make small-scale exports to non-FTA countries, in turn, is filed under DOE/OGES’s “small-scale natural gas exports” rule codified at 10 C.F.R. §§ 590.102(p) and 590.208(a) and should be deemed consistent with the public interest under NGA Section 3(a). Accordingly, Carib Energy respectfully requests that DOE/OGES approve this application without modification or delay.

I. COMMUNICATIONS

Communications regarding Carib Energy’s application should be directed to the following:

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II. DESCRIPTION OF THE APPLICANT

Carib Energy, a company incorporated under the laws of the State of Delaware, is a wholly-owned subsidiary of Crowley Shipping, Inc. (“Crowley”), with its principal place of business in Jacksonville, Florida. Crowley is a wholly-owned subsidiary of Crowley Maritime Corporation, which is a wholly-owned subsidiary of Crowley Holdings, Inc. Crowley Holdings, Inc. is a privately-held corporation.

III. BACKGROUND AND EXISTING AUTHORIZATIONS

Carib Energy currently exports previously imported LNG purchased at the Crowley Facility in Peñuelas, Puerto Rico. The Crowley Facility receives LNG that has been imported into Puerto Rico via the EcoEléctrica LNG Terminal. The Crowley Facility has an annual LNG send-out capability equivalent to approximately 7.3 Bcf of natural gas. Carib Energy currently exports the LNG via approved IMO7/TVAC-ASME LNG containers transported on ocean-going vessels. At present, Carib Energy exports LNG to Barbados.

Carib Energy currently holds a short-term blanket authorization to export to FTA and non-FTA countries LNG previously imported into Puerto Rico from foreign sources pursuant to DOE Order No. 5114.³

IV. AUTHORIZATION REQUESTED

Carib Energy requests blanket authorization to make small-scale LNG exports to FTA and non-FTA nations. With the evolving development of new global gas supply to

³ *Carib Energy (USA) LLC*, DOE Order No. 5114, Order Granting Blanket Authorization to Export Liquefied Natural Gas Previously Imported from Foreign Sources and Liquefied Natural Gas Received from Domestic Sources to Free Trade Agreement Nations, and Authorizing Small-Scale Exports of Liquefied Natural Gas (April 5, 2024).

serve Puerto Rico there is potential for the EcoEléctrica terminal to receive LNG from domestic as well as foreign LNG supply sources during the term of the small-scale export authorization requested by Carib Energy. Third-party LNG suppliers would be responsible for the LNG imported to the EcoEléctrica Terminal that Carib Energy ultimately purchases at and exports from the Crowley Facility. The source location of the domestic LNG would originate from a current or possible future LNG export terminal as selected by the LNG supplier. For this reason, Carib Energy's application seeks the flexibility to export from the Crowley Facility LNG volumes either previously imported into Puerto Rico from foreign sources or received from sources within the United States.

Carib Energy would export LNG either previously imported from sources outside the United States or received from sources within the United States. Carib Energy would export these LNG volumes from the Crowley Facility either via approved IMO7/TVAC-ASME LNG containers transported on ocean-going vessels or via small-scale LNG vessels to (i) Barbados, the Dominican Republic, Antigua and (ii) any other FTA country or non-FTA country within the Caribbean, Central America or South America which has, or in the future develops, the capacity to import LNG, provided that trade with that country is not prohibited by United States law or policy. The authorization requested by this application would extend for a two-year period, commencing on the earlier of April 6, 2026 or the date of an order granting the requested authorization.⁴ Carib Energy requests this authorization both on its own behalf and when acting on behalf of other entities who themselves hold title

⁴ If this application is still pending approval on April 6, 2026 – the date on which Carib Energy's short-term blanket authorization under Order No. 5114 expires – Carib Energy respectfully requests that DOE/OGES grant retroactive authorization to ensure there is no lapse in authorization for Carib Energy to continue exporting LNG under the terms of DOE Order No. 5114 until DOE/OGES issues a decision on this application.

to the LNG, after registering each such entity with DOE/OGES in accordance with the established procedures.

There are no other proceedings related to this application currently pending before DOE/OGES or any other federal agency.

V. STANDARD OF REVIEW

LNG exports to FTA nations and small-scale LNG exports to non-FTA countries are deemed consistent with the public interest under Sections 3(a) and (c) of the NGA⁵ and DOE/OGES regulations. NGA Section 3(c) provides that the export of natural gas, including LNG, from and to a nation with which there is in effect a free trade agreement requiring national treatment for trade in natural gas are deemed consistent with the public interest. Section 3(c) directs that applications for such exports must be granted without modification or delay.

Small-scale exports to non-FTA countries are deemed consistent with the public interest under NGA Section 3(a) pursuant to DOE/OGES regulations. Section 590.208(a) of DOE's regulations provides:

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

10 C.F.R. § 590.208(a) (2023). Section 590.102(p) of DOE's regulations, in turn, defines a "small-scale natural gas export" as:

⁵ 15 U.S.C. §§ 717b (a) and (c) (2018).

An export of natural gas to nations with which there is not in effect a free trade agreement with the United States requiring national treatment for trade in natural gas and with which trade is not prohibited by U.S. law or policy that the application for such export authority satisfies the following two criteria:

(1) The application proposes to export natural gas in a volume up to and including 51.75 billion cubic feet per year, and DOE's approval of the application does not require an environmental impact statement or an environmental assessment under the National Environmental Policy Act, 42 U.S.C. 4321 et seq.

10 C.F.R. § 590.102(p) (2023).

VI. PUBLIC INTEREST

Carib Energy's proposed LNG exports are consistent with the public interest and merit prompt authorization. More specifically, Carib Energy's request for authorization to make small-scale exports of up to 7.3 Bcf of LNG annually from the Crowley Facility (14.6 Bcf over a two-year period) to FTA and non-FTA countries is deemed consistent with the public interest pursuant to NGA Section 3 and DOE/OGES regulations.

Carib Energy's proposed LNG exports to FTA countries are deemed in the public interest pursuant to NGA Section 3(c). As noted earlier, DOE/OGES must approve such LNG exports without modification or delay.

Carib Energy's proposed small-scale exports to non-FTA countries, meanwhile, are deemed in the public interest under NGA Section 3(a) pursuant to Sections 590.208(a) and 590.102(p) of DOE/OGES's regulations due to their modest annual volumes in combination with the applicable DOE/OGES categorical exclusion from NEPA review, as discussed below. Indeed, the proposed small-scale LNG export volumes, which would serve the immediate, ongoing needs of countries in the Caribbean region, as well as

emerging needs in Central American and South American markets, are precisely the type of small-scale exports that DOE/OGES authorized to “allow for greater diversity and competition in the natural gas market, consistent with the public interest under NGA section 3(a).”⁶

VII. ENVIRONMENTAL IMPACT

As described earlier, Carib Energy intends to export LNG from the Crowley Facility either via IMO7/TVAC-ASME LNG transported on ocean-going vessels or via small-scale LNG vessels to Barbados, the Dominican Republic, Antigua and potentially other markets in the Caribbean, Central America and South America developed during the requested two-year authorization term.

DOE regulations provide a list of categorical exclusions from the preparation of an environmental analysis or environmental impact statement under NEPA. Categorical exclusion B5.7 (“Export of natural gas and associated transportation by marine vessel”) affords an exclusion, in relevant part, for “Approvals . . . of new authorizations . . . to export natural gas under section 3 of the Natural Gas Act and any associated transportation of natural gas by marine vessel.”⁷ Because Carib Energy seeks a new two-year authorization to export natural gas either via IMO7/TVAC-ASME LNG containers transported on ocean-going vessels or via small-scale LNG vessels, its filing falls within categorical exclusion B5.7 and requires no further environmental analysis under NEPA.

VIII. APPENDICES

The following appendices are included with this application:

⁶ Final Rule, Small-Scale Natural Gas Exports, DOE Docket No. 17-86-R, Fed. Reg. Vol. 83, No. 143 at 35107 (July 25, 2018).

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

Appendix A: Verification

Appendix B: Opinion of Counsel

IX. CONCLUSION

For the foregoing reasons, Carib Energy respectfully requests that DOE/OGES grant the requested two-year blanket authorization for LNG exports up to 7.3 Bcf annually (14.6 Bcf over the two-year term) from the Crowley Facility to Barbados, the Dominican Republic, Antigua and other FTA and non-FTA countries in the Caribbean, Central America and South America without modification or delay.

Respectfully submitted,

/s/ Paul Forshay

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Counsel for Carib Energy (USA) LLC

March 17, 2026

APPENDIX A

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

Carib Energy (USA) LLC

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Docket No. 26-_____ -LNG

VERIFICATION

I, Jackie Gonzalez, declare that I am Vice President – Crowley Advanced Energy and am duly authorized to make this Verification on behalf of Carib Energy (USA) LLC; that I have read the foregoing instrument and that the facts therein stated are true and correct to the best of my knowledge, information, and belief.

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

Executed in Jacksonville, Florida on March 17, 2026.

/s/ Jackie Gonzalez

Jackie Gonzalez

Vice President

Crowley Advanced Energy

9487 Regency Square Blvd.

Jacksonville, FL 32225

APPENDIX B

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

Carib Energy (USA) LLC

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Docket No. 26-_____LNG

OPINION OF COUNSEL

This opinion is furnished pursuant to Section 590.202(c) of the Department of Energy's Regulations, 10 C.F.R. § 590.202(c) and in connection with the request of Carib Energy (USA) LLC ("Carib Energy") for blanket authorization to export liquefied natural gas. I am counsel for Carib Energy. I have reviewed and relied upon the corporate formation documents of Carib Energy and information provided to me by its upstream parent company, Crowley Maritime Corporation. Based on the foregoing, and for the purposes of Carib Energy's application to the Hydrocarbons and Geothermal Energy Office, I am of the opinion that the proposed exports as described in the application are within the corporate powers of Carib Energy.

Respectfully submitted,

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