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

In The Matter Of:

Sabine Pass Liquefaction, LLC

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Docket No. 26-___-LNG

**APPLICATION OF SABINE PASS LIQUEFACTION, LLC
FOR BLANKET AUTHORIZATION TO EXPORT PREVIOUSLY IMPORTED
LIQUEFIED NATURAL GAS**

Pursuant to Section 3 of the Natural Gas Act (“NGA”)¹ and Part 590 of the Department of Energy’s (“DOE”) regulations,² Sabine Pass Liquefaction, LLC (“SPL”) hereby requests that DOE’s Hydrocarbons and Geothermal Energy Office issue an order granting blanket authorization for SPL to engage in short-term exports of up to 500 billion cubic feet (“Bcf”)³ of liquefied natural gas (“LNG”), on a cumulative basis, that has been previously imported into the U.S. from foreign sources, for a two-year period commencing on June 7, 2026.⁴ SPL is seeking such authorization to export previously imported LNG from the Sabine Pass LNG terminal, owned by Sabine Pass LNG, L.P., in Cameron Parish, Louisiana, 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.

In support of the instant application, SPL states as follows:

¹ 15 U.S.C. § 717b.

² 10 C.F.R. Part 590 (2025).

³ The equivalent of up to approximately 525 to 545 Trillion British Thermal units (“TBtus”).

⁴ June 7, 2026 is the day following the date upon which SPL’s existing blanket re-export authorization is scheduled to expire. *Sabine Pass Liquefaction, LLC*, Order Granting Blanket Authorization to Export Previously Imported Liquefied Natural Gas By Vessel to Free Trade Agreement and Non-Free Trade Agreement Nations, DOE/FECM Order No. 5125, Docket No. 24-28-LNG (Jun. 6, 2024) [hereinafter “*Order No. 5125*”]. On June 6, 2024, in Order No. 5125, DOE authorized SPL to engage in short-term exports of up to 500 Bcf, on a cumulative basis, of LNG that has been imported into the United States from foreign sources 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, for a two-year period commencing June 7, 2024.

I.
DESCRIPTION OF THE APPLICANT

The exact name of the applicant is Sabine Pass Liquefaction, LLC, which is a Delaware limited liability company authorized to do business in the states of Louisiana, Texas, Alabama, Arkansas, Illinois, Indiana, Kentucky, Mississippi, Ohio, Oklahoma, Pennsylvania, Tennessee, and West Virginia, and has its principal place of business at 845 Texas Avenue, Suite 1250, Houston, Texas 77002. SPL is an indirect subsidiary of Cheniere Energy, Inc. (“Cheniere Energy”), a Delaware corporation with its primary place of business at 845 Texas Avenue, Suite 1250, Houston, Texas 77002. Cheniere Energy is a developer, owner, and operator of LNG terminals and natural gas pipelines on the Gulf Coast, including the Sabine Pass LNG terminal.

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:⁵

Florian Pintgen, Vice President, Commercial Operations
Karri Mahmoud, Director, Environmental & Regulatory
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⁵ SPL requests waiver of Section 590.202(a) of DOE’s regulations, to the extent necessary to include each of the individuals listed here 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,⁶ SPL hereby certifies that the persons listed above and the undersigned are the duly authorized representatives of SPL.

III.
DESCRIPTION OF PROPOSAL

SPL requests blanket authorization to export previously imported LNG on a short-term or spot market basis up to 500 Bcf (the equivalent of approximately 525 to 545 TBtus) cumulatively over a two-year period commencing on June 7, 2026. SPL is requesting such authorization to export LNG for itself and as agent for third parties who may hold title to the LNG at the time of export. SPL anticipates exporting previously imported LNG 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. SPL is not herein seeking authorization to export domestically-produced natural gas or LNG. The LNG that is proposed to be exported is derived from SPL’s LNG importing activities and resides in LNG storage tanks at the Sabine Pass LNG terminal. The LNG will either be re-exported or re-gasified to be consumed in the domestic natural gas market, contingent on U.S. and global market price signals. No physical modifications to the Sabine Pass LNG terminal are required to accommodate the export authorization requested herein. No other proceedings related to this application are currently pending before DOE or any other federal agency.

IV.
PUBLIC INTEREST

Pursuant to Section 3 of the NGA, applications to export natural gas to nations with which there is in effect a free trade agreement (“FTA”) requiring national treatment for trade in natural gas “shall be deemed to be consistent with the public interest” and, therefore, the FTA portion of

⁶ 10 C.F.R. § 590.103(b).

the instant application should be “granted without modification or delay.”⁷ With respect to the non-FTA portion of this application, DOE is required to authorize exports of natural gas to non-FTA nations unless there is a finding that such exports “will not be consistent with the public interest.”⁸ Section 3 of the NGA thus creates a statutory presumption in favor of approval of this application which opponents bear the burden of overcoming.⁹ Further, in evaluating an export application, DOE applies the principles described in DOE Delegation Order No. 0204-111, which focuses primarily on domestic need for the gas to be exported, and DOE’s 1984 Policy Guidelines.¹⁰ As detailed below, SPL’s proposal to export LNG to those countries with the capacity to import LNG via ocean-going carrier and with which trade is not prohibited by U.S. law or policy, is consistent with Section 3 of the NGA and DOE policy.

In Order No. 5125, which granted SPL blanket authorization to export up to 500 Bcf (cumulatively) of previously imported foreign-sourced LNG, DOE determined 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 LNG that SPL seeks to export.”¹¹ More recently, in Order No. 5340, issued on September 22, 2025,

⁷ 15 U.S.C. § 717b(c); *see also* *Order No. 5125*, at 3.

⁸ 15 U.S.C. § 717b(a).

⁹ *See* *Sierra Club v. DOE*, 134 F.4th 568, 572-73 (D.C. Cir. 2025) (noting the public interest standard in Section 3(a) is structured with “a presumption favoring export applications”). *See also*, *Sierra Club v. DOE*, 867 F.3d 189, 203 (D.C. Cir. 2017) (explaining that the D.C. Circuit construes Section 3(a) to contain a presumption in favor of export authorization); *Panhandle Producers and Royalty Owners Ass’n v. ERA*, 822 F.2d 1105, 1111 (D.C. Cir. 1987) (finding that Section 3 of the NGA “requires an affirmative showing of inconsistency with the public interest to *deny* an application” and that a “presumption favoring ... authorization ... is completely consistent with, if not mandated by, the statutory directive.”) (emphasis in original).

¹⁰ *See* 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 Related to Regulation of Imported Natural Gas*, 49 Fed. Reg. 6684 (Feb. 22, 1984) [hereinafter *1984 Policy Guidelines*]; 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 importance of the domestic need for natural gas among the factors it evaluates, consistent with the order. *See, e.g.,* *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, at 27-28 (Mar. 16, 2022).

¹¹ *Order No. 5125*, at 12.

DOE authorized the export of previously imported LNG, citing recent data that substantiates U.S. consumer access to ample volumes of natural gas to meet domestic demand.¹² Specifically, in Order No. 5340, DOE took administrative notice that the Energy Information Administration (“EIA”) Annual Energy Outlook 2025 (“AEO 2025”) projected “annual domestic dry natural gas production in 2026 and 2027 of 38.94 trillion cubic feet (Tcf) and 39.09 Tcf, respectively, with total natural gas consumption projected to be 32.13 Tcf and 32.54 Tcf in each respective year.”¹³ In this regard, DOE found that AEO 2025 supported the conclusion that volumes of foreign-sourced LNG are not needed to meet domestic demand.¹⁴ EIA’s most recent projections continue to show that domestic natural gas production similarly exceeds domestic consumption. In the March 2026 Short Term Energy Outlook (“STEO”), 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. Production rises by an additional 3% in 2027 to reach 124 Bcf/d. The 2027 forecast is almost 2 Bcf/d higher than last month’s outlook.”¹⁵ 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 2025.¹⁶ In this regard, EIA data continues to demonstrate that volumes of foreign-sourced LNG are not needed to satisfy domestic natural gas demand.

Moreover, as DOE has recently highlighted, one of the primary conclusions of the 2024 LNG Export Study¹⁷ is that “domestic natural gas supply is sufficient to meet both domestic

¹² *Golden Pass LNG Terminal LLC*, Order Granting Blanket Authorization to Export Liquefied Natural Gas Previously Imported From Foreign Sources to Free Trade Agreement and Non-Free Trade Agreement Nations, DOE/FECM Order No. 5340, Docket No. 25-81-LNG (Sept. 22, 2025) [hereinafter “*Order No. 5340*”].

¹³ *Id.* at 10.

¹⁴ *Id.*

¹⁵ 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>.

¹⁶ *Id.* at tbl. 5a (U.S. Natural Gas Supply, Consumption, and Inventories).

¹⁷ 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) [hereinafter “*2024 LNG Export Study*”].

demand and the modeled global demand for U.S. LNG in all [modelled] scenarios, including sensitivity scenarios on U.S. oil and gas supply.”¹⁸ DOE’s Response to Comments on the 2024 LNG Export Study 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.”¹⁹

SPL is requesting authorization to export LNG for itself and as agent for third parties who themselves hold title to the LNG at the time of export. SPL will comply with all DOE requirements for exporters and agents, including the registration requirements as first established in *Freeport LNG Expansion, L.P., et al.*, DOE/FE Order No. 2913, and confirmed in *Gulf Coast LNG Export, LLC*, DOE/FE Order No. 3163.²⁰ In this regard, SPL, when acting as agent, will register with DOE each LNG title holder for whom it seeks to export as agent, and will provide DOE with a written statement by the title holder acknowledging and agreeing to: (i) comply with all requirements in SPL’s export authorization; and (ii) include those requirements in any subsequent purchase or sale agreement entered into by the title holder.

Granting SPL’s short-term blanket authorization as requested herein would provide SPL with the necessary flexibility it requires to respond to changes in domestic and global markets for natural gas and LNG. Such authorization would enable SPL to avail itself of spot-market LNG import cargoes, which in turn would help to further promote the liquidity of supply available to

¹⁸ *Corpus Christi Liquefaction, LLC, CCL Midscale 8-9, LLC, and 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, at 19 (Feb. 26, 2026) (citing 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*”]).

¹⁹ *Response to Comments*, at 43.

²⁰ *See 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 (Feb. 10, 2011), *as amended*, Errata Notice, DOE/FE Order No. 2913, FE Docket No. 10-160-LNG (Feb. 17, 2011); *Gulf Coast LNG Export, LLC*, Order Granting Long-Term Multi-Contract Authorization to Export Liquefied Natural Gas By Vessel From the Proposed Brownsville Terminal to Free Trade Agreement Nations, DOE/FE Order No. 3163, FE Docket No. 12-05-LNG (Oct. 16, 2012).

the U.S. market. Natural gas derived from imported LNG would be available to supply local markets when conditions support greater domestic use, and would thereby serve to moderate U.S. gas price volatility. Furthermore, the ability to re-export previously imported LNG helps to encourage continued imports, which in turn helps to ensure that the Sabine Pass LNG terminal facilities will more efficiently remain in ready operating condition. As such, the requested export authorization is consistent with the public interest.

V. ENVIRONMENTAL IMPACT

No changes to the Sabine Pass LNG terminal facilities would be required for SPL's proposed exportation of foreign-sourced LNG. Consequently, granting this application will not be a federal action significantly affecting the human environment within the meaning of the National Environmental Policy Act ("NEPA").²¹ Therefore, an environmental impact statement or environmental assessment is not required. As DOE confirmed in Order No. 5340, "NEPA procedures provide for a categorical exclusion if neither an environmental assessment (EA) nor an environmental impact statement (EIS) is required—specifically, categorical exclusion B5.7, Export of natural gas and associated transportation by marine vessel."²² Such categorical exclusion should be similarly applied here.

VI. APPENDICES

The following appendices are attached hereto and incorporated by reference herein:

- Appendix A: Verification
- Appendix B: Opinion of Counsel

²¹ 42 U.S.C. §§ 4321, *et seq.*

²² *Order No. 5340*, at 12.

VII.
CONCLUSION

For the foregoing reasons, SPL respectfully requests that DOE determine that SPL's request for blanket authorization as discussed herein, is not inconsistent with the public interest, and grant such authorization as expeditiously as possible but no later than June 6, 2026.

Respectfully submitted,

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Dated: March 25, 2026

Appendix A
Verification

VERIFICATION

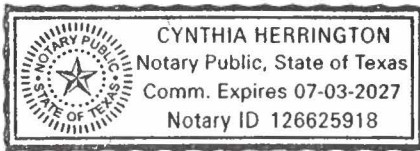
State of Texas)
County of Harris)

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 the 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 24th day of March, 2026.



Cynthia Herrington
Name: Cynthia Herrington
Title: Notary Public

My Commission expires: 07-03-2027

Appendix B
Opinion of Counsel

March 23, 2026

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

**RE: Sabine Pass Liquefaction, LLC
Docket No. 26-___-LNG
Application of Sabine Pass Liquefaction, LLC for Blanket Authorization to Export
Previously Imported Liquefied Natural Gas**

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 Agreement of Sabine Pass Liquefaction, LLC and other authorities as necessary and have concluded that the proposed exportation of liquefied natural gas is within Sabine Pass Liquefaction, LLC's corporate powers.

Respectfully submitted,



By: Sean Markowitz
Executive Vice President, Chief Legal Officer and Corporate Secretary
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