

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

_____))
VENTURE GLOBAL PLAQUEMINES LNG, LLC)) DOCKET NO. 16-28-LNG
_____))

ORDER AMENDING LONG-TERM AUTHORIZATION
TO EXPORT LIQUEFIED NATURAL GAS
TO NON-FREE TRADE AGREEMENT NATIONS

DOE/HGEO ORDER NO. 4446-B

MARCH 13, 2026

TABLE OF CONTENTS

I.	INTRODUCTION.....	4
II.	BACKGROUND.....	10
	A. DOE’s Prior LNG Studies.....	10
	B. Judicial Decisions Upholding DOE’s Non-FTA Authorizations.....	11
	C. DOE’s Categorical Exclusion and Marine Transport Technical Support Document ...	12
	D. Executive Order Issued on January 20, 2025.....	14
III.	DOE’S 2024 LNG EXPORT STUDY.....	14
	A. Overview.....	14
	B. Methodology.....	15
	C. DOE Proceeding.....	18
	D. DOE’s Findings and Conclusions.....	19
	1. Key Findings.....	19
	2. Conclusions.....	20
IV.	PUBLIC INTEREST STANDARD.....	21
V.	DESCRIPTION OF REQUEST.....	23
	A. Description of Applicant.....	24
	B. Project Updates.....	26
VI.	APPLICANT’S PUBLIC INTEREST ANALYSIS.....	27
	A. Overview.....	27
	B. Domestic Natural Gas Supply and Demand.....	27
	C. Effects on Domestic Prices of Natural Gas.....	28
	D. Economic Benefits.....	28
	E. International Trade and Geopolitical Benefits.....	29
VII.	CURRENT PROCEEDING BEFORE DOE.....	29
	A. Public Comments.....	29
	B. Public Citizen’s Motion to Intervene and Protest.....	31
	C. Sierra Club and Healthy Gulf’s Joint Motion to Intervene and Protest.....	32
	D. Plaquemines LNG’s Answer.....	37
VIII.	DISCUSSION AND CONCLUSIONS.....	41
	A. Procedural Matters.....	41
	B. Economic Issues.....	41
	1. Significance of the 2024 LNG Export Study on Economic Issues.....	41

2. Plaquemines LNG’s Amendment Application	44
C. Energy Security	47
D. Issuance of Categorical Exclusion Under NEPA.....	51
E. Other Considerations.....	55
F. Conclusion	55
IX. FINDINGS	61
X. TERMS AND CONDITIONS	62
H. Export Quantity.....	62
I. Combined FTA and Non-FTA Export Authorization Volumes	62
XI. ORDER	62
APPENDIX: LONG-TERM EXPORT AUTHORIZATIONS FOR THE PLAQUEMINES LNG PROJECT.....	67

FREQUENTLY USED ACRONYMS

AEO	Annual Energy Outlook
Bcf/d	Billion Cubic Feet per Day
Bcf/yr	Billion Cubic Feet per Year
DOE	U.S. Department of Energy
EA	Environmental Assessment
EIA	U.S. Energy Information Administration
EIS	Environmental Impact Statement
FE	Office of Fossil Energy (prior to July 4, 2021)
FECM	Office of Fossil Energy and Carbon Management (July 4, 2021 to November 19, 2025)
FERC	Federal Energy Regulatory Commission
FID	Final Investment Decision
FTA	Free Trade Agreement
GDP	Gross Domestic Product
GHG	Greenhouse Gas
HGEO	Hydrocarbons and Geothermal Energy Office (from November 20, 2025)
LNG	Liquefied Natural Gas
MMBtu	Million British Thermal Units
mtpa	Million Metric Tons per Annum
NEPA	National Environmental Policy Act
NGA	Natural Gas Act
STEO	Short-Term Energy Outlook
Tcf	Trillion Cubic Feet

I. INTRODUCTION

On March 11, 2022, Venture Global Plaquemines LNG, LLC (Plaquemines LNG) filed an application (Amendment Application)¹ with the Department of Energy's (DOE) Office of Fossil Energy and Carbon Management (FECM) (now the Hydrocarbons and Geothermal Energy Office)² under section 3 of the Natural Gas Act (NGA).³ Plaquemines LNG asks DOE for a limited amendment to increase its authorized exports of domestically produced liquefied natural gas (LNG).

At the time of the Amendment Application, Plaquemines LNG was authorized to export domestically produced LNG by vessel from the Plaquemines LNG Project (the Project), located on the west bank of the Mississippi River, near river mile marker 55, in Plaquemines Parish, Louisiana, in a total combined volume equivalent to 1,240 billion cubic feet per year (Bcf/yr) of natural gas under the following orders and their amendments:

- (i) DOE/FE Order No. 3866,⁴ authorizing exports to any country with which the United States currently has, or in the future will have, a free trade agreement (FTA) requiring national treatment for trade in natural gas (FTA countries), under NGA section 3(c);⁵ and

¹ Venture Global Plaquemines LNG, LLC, Application for Limited Amendment to Existing Long-Term, Multi-Contract Authorizations to Export Liquefied Natural Gas to Free Trade and Non-Free Trade Agreement Nations, Docket No. 16-28-LNG (Mar. 11, 2022) [hereinafter Amendment App.].

² The Office of Fossil Energy (FE) changed its name to the Office of Fossil Energy and Carbon Management (FECM) on July 4, 2021. Subsequently, on November 20, 2025, FECM changed its name to the Hydrocarbons and Geothermal Energy Office (HGEO). In this Order, DOE uses the acronym in effect at the time of each order or action discussed.

³ 15 U.S.C. § 717b. The authority to regulate the imports and exports of natural gas, including liquefied natural gas, under section 3 of the NGA (15 U.S.C. § 717b) has been delegated to the Assistant Secretary for FECM (now the Assistant Secretary for HGEO) in Redelegation Order No. S4- DEL-FE1-2023, issued on April 10, 2023.

⁴ *Venture Global Plaquemines LNG, LLC*, DOE/FE Order No. 3866, Docket No. 16-28-LNG, Order Granting Long-Term, Multi-Contract Authorization to Export Liquefied Natural Gas by Vessel from the Proposed Plaquemines LNG Terminal in Plaquemines Parish, Louisiana, to Free Trade Agreement Nations (July 21, 2016), *amended by* DOE/FE Order No. 3866-A (Oct. 21, 2020) (extending export term), *further amended by* DOE/FECM Order No. 3866-B (June 13, 2022) (increasing export volume).

⁵ 15 U.S.C. § 717b(c). The United States currently has FTAs requiring national treatment for trade in natural gas with Australia, Bahrain, Canada, Chile, Colombia, Dominican Republic, El Salvador, Guatemala, Honduras, Jordan, Mexico, Morocco, Nicaragua, Oman, Panama, Peru, Republic of Korea, and Singapore. FTAs with Israel and Costa Rica do not require national treatment for trade in natural gas.

- (ii) DOE/FE Order No. 4446,⁶ authorizing exports to any other country with which trade is not prohibited by U.S. law or policy (non-FTA countries), under NGA section 3(a).⁷

These orders, as amended, authorize exports to FTA and non-FTA countries on a non-additive basis through December 31, 2050.⁸ On December 26, 2024, Plaquemines LNG exported its first cargo of LNG from the Project.⁹

In the Amendment Application, Plaquemines LNG states that its current volume of approved exports to non-FTA countries, 1,240 Bcf/yr of natural gas (which it states is equivalent to 24 million metric tons per annum (mtpa) of LNG), reflects the maximum liquefaction capacity of the Project approved by the Federal Energy Regulatory Commission (FERC) in 2019.¹⁰

Plaquemines LNG states that it has since advanced and refined the final design of the Project and “learned significant lessons from the actual construction and production experience of the affiliated, and technologically-identical, Venture Global Calcasieu Pass, LLC . . . export project.”¹¹ Based on that refined analysis, Plaquemines LNG sought an “uprate” amendment from FERC to increase the Project’s peak liquefaction capacity under optimal conditions from 24.0 mtpa to 27.2 mtpa of LNG, or from approximately 1,240 Bcf/yr to 1,405.33 Bcf/yr of

⁶ *Venture Global Plaquemines LNG, LLC*, DOE/FE Order No. 4446, Docket No. 16-28-LNG, Opinion and Order Granting Long-Term Authorization to Export Liquefied Natural Gas to Non-Free Trade Agreement Nations (Oct. 16, 2019), *amended by* DOE/FE Order No. 4446-A (Oct. 21, 2020) (extending export term).

⁷ 15 U.S.C. § 717b(a).

⁸ *See* DOE/FE Order Nos. 3866-A and 4446-A; Amendment App. at 2. *See also* U.S. Dep’t of Energy, Extending Natural Gas Export Authorizations to Non-Free Trade Agreement Countries Through the Year 2050; Notice of Final Policy Statement and Response to Comments, 85 Fed. Reg. 52,237 (Aug. 25, 2020) [hereinafter 2050 Policy Statement]. Additionally, DOE notes that, effective January 12, 2021, long-term export authorizations contain authority to export the same approved volume of LNG pursuant to transactions with terms of less than two years, including commissioning volumes, on a non-additive basis. *See* U.S. Dep’t of Energy, Including Short-Term Export Authority in Long-Term Authorizations for the Export of Natural Gas on a Non-Additive Basis; Policy Statement, 86 Fed. Reg. 2243 (Jan. 12, 2021).

⁹ *See* Venture Global Plaquemines LNG, LLC, Notification of First Export Cargo, Docket No. 16-28-LNG (Jan. 8, 2025).

¹⁰ Amendment App. at 2 & n.5 (citing *Venture Global Plaquemines LNG, LLC, et al.*, Order Granting Authorizations Under Sections 3 and 7 of the Natural Gas Act, 168 FERC ¶ 61,204 (2019)).

¹¹ *Id.* at 3.

natural gas.¹² Plaquemines LNG maintains that the proposed increase in peak liquefaction capacity “does *not* involve the construction of any new facilities nor any modification of the previously authorized facilities.”¹³

In light of its then-pending amendment request at FERC, Plaquemines LNG requests that DOE increase the authorized export volume in its FTA order (Order No. 3866, as amended) and its non-FTA order (Order No. 4446, as amended) by an increment of 165.33 Bcf/yr of natural gas on a non-additive basis—for a total authorized export volume of 1,405.33 Bcf/yr to both FTA and non-FTA countries.¹⁴ Plaquemines LNG states that “[a]ll other obligations, rights, and responsibilities of the export authorizations . . . would remain the same without change.”¹⁵

On May 12, 2022, DOE published a notice of the non-FTA portion of the Amendment Application in the *Federal Register* (Notice of Application).¹⁶ The Notice of Application called on interested persons to submit protests, motions to intervene, notices of intervention, and written comments by July 11, 2022.¹⁷ In response to the Notice of Application, DOE received the following timely-filed documents: (i) a Motion to Intervene and Protest filed by Public

¹² *See id.* at 3, 8.

¹³ *Id.* at 3 (emphasis in original).

¹⁴ *Id.* at 3-4; *see also id.* at 8-9.

¹⁵ *Id.* at 4; *see also id.* at 9. DOE notes that, on March 5, 2026, Plaquemines LNG filed a new application in this docket, requesting an additional increase in its FTA and non-FTA export volume beyond the requested increase at issue in this Order. *See* Venture Global Plaquemines LNG, LLC, Application for Limited Amendment of Authorizations to Export Liquefied Natural Gas to Free Trade and Non-Free Trade Agreement Nations, Docket No. 16-28-LNG (Mar. 5, 2026). Additionally, on November 17, 2025, an affiliate of Plaquemines LNG, Plaquemines Expansion, LLC, filed an application to export additional domestically produced LNG from the Project and the proposed Plaquemines Expansion Project (which will be located immediately adjacent to the Project). *See* Plaquemines Expansion, LLC, Application for Authorizations to Export Liquefied Natural Gas to Free Trade and Non-Free Trade Agreement Nations, Docket No. 25-143-LNG (Nov. 17, 2025). Both of these applications are pending.

¹⁶ Venture Global Plaquemines LNG, LLC; Application for Limited Amendment to Existing Long-Term, Multi-Contract Authorization to Export Liquefied Natural Gas to Non-Free Trade Agreement Nations; Notice of Application, 87 Fed. Reg. 29,149 (May 12, 2022).

¹⁷ *Id.* at 29,149. DOE finds that the requirement for public notice of applications in 10 C.F.R. Part 590 is applicable only to non-FTA applications under NGA section 3(a).

Citizen, Inc. (Public Citizen);¹⁸ (ii) a Motion to Intervene and Protest jointly filed by Sierra Club and Healthy Gulf (collectively, Environmental Intervenors);¹⁹ (iii) two comments opposing the Amendment Application, submitted by Anonymous and Christopher Lish, respectively;²⁰ and (iv) an additional comment opposing the Amendment Application submitted by Sierra Club’s “Beyond Dirty Fuels Campaign,” which Sierra Club states was signed by 7,242 people.²¹ On July 26, 2022, Plaquemines LNG filed an “Answer to Protests of Limited Amendment Application.”²²

On June 13, 2022, in Order No. 3866-B, DOE granted the requested amendment to Plaquemines LNG’s FTA authorization, as required by NGA section 3(c).²³ Further, we take administrative notice that, on February 19, 2025, FERC issued an order granting Plaquemines LNG’s requested amendment, such that the Project’s total authorized LNG export capacity is now 27.2 mtpa of LNG, equivalent to 1,405.33 Bcf/yr of natural gas.²⁴

DOE has reviewed the non-FTA portion of the Amendment Application, Public Citizen’s and Environmental Intervenors’ Pleadings, the comments opposing the Amendment Application, Plaquemines LNG’s Answer, relevant portions of DOE’s 2024 LNG Export Study (or the 2024

¹⁸ Public Citizen, Inc., Motion to Intervene and Protest, Docket No. 16-28-LNG (July 11, 2022) [hereinafter Public Citizen Pleading].

¹⁹ Sierra Club & Healthy Gulf, Motion to Intervene and Protest, Docket No. 16-28-LNG (July 11, 2022) [hereinafter Enviro. Intervenors Pleading].

²⁰ Comment of Anonymous, Docket No. 16-28-LNG (June 1, 2022) [hereinafter Anon. Comment]; Comment of Christopher Lish, Docket No. 16-28-LNG (July 11, 2022) [hereinafter Lish Comment].

²¹ Comments of Sierra Club, Beyond Dirty Fuels Campaign, Docket No. 16-28-LNG (July 11, 2022) [hereinafter Sierra Club Beyond Dirty Fuels Comment].

²² Venture Global Plaquemines LNG, LLC, Answer to Protests of Limited Amendment Application, Docket No. 16-28-LNG (July 26, 2022) [hereinafter Plaquemines LNG Answer].

²³ *Venture Global Plaquemines LNG, LLC*, DOE/FECM Order No. 3866-B.

²⁴ *Venture Global Plaquemines LNG, LLC*, Order Amending Authorization under Section 3 of the Natural Gas Act, FERC Docket No. CP22-92-000, 190 FERC ¶ 61,113 (2025), https://elibrary.ferc.gov/eLibrary/filelist?accession_number=20250219-3085&optimized=false&sid=5577793c-2dd6-4278-b38b-b83cfdda9d8e [hereinafter FERC Amendment Order].

Study),²⁵ the public comments received on the 2024 Study, and DOE’s Response to Comments on the 2024 Study,²⁶ among other evidence discussed below. On the basis of this substantial administrative record, and taking into account the considerations directed by Executive Order (E.O.) 14154, *Unleashing American Energy*,²⁷ DOE has determined that it has not been shown that Plaquemines LNG’s proposed increase in exports of LNG to non-FTA countries will be inconsistent with the public interest, as would be required to deny the Amendment Application under NGA section 3(a).

DOE notes that, while Plaquemines LNG is already authorized to export LNG from the Project in a volume equivalent to 1,405.33 Bcf/yr of natural gas to FTA countries,²⁸ this Order will give Plaquemines LNG the flexibility to allow exports to non-FTA countries consistent with the maximum production capacity authorized by FERC. Moreover, DOE finds that Plaquemines LNG’s 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. DOE further finds that granting the requested amendment is unlikely to adversely affect the availability of natural gas supplies to domestic consumers or result in

²⁵ U.S. Dep’t of Energy, Office of Fossil Energy & Carbon Management, *Energy, Economic, & Environmental Assessment of U.S. LNG Exports* (Dec. 2024), <https://fossil.energy.gov/app/docketindex/docket/index/30> [hereinafter 2024 LNG Export Study or 2024 Study] (providing links); *see also infra* § III (DOE’s 2024 LNG Export Study).

²⁶ 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* (May 19, 2025), https://www.energy.gov/sites/default/files/2025-05/2024%20LNG%20Export%20Study_Response%20to%20Comments_Final_05.19.2025.pdf [hereinafter Response to Comments]. DOE published a Notice of Availability of the Response to Comments on May 22, 2025. *See* U.S. Dep’t of Energy, Notice of Availability of Response to Comments for 2024 LNG Export Study: Energy, Economic, and Environmental Assessment of U.S. LNG Exports, 90 Fed. Reg. 21,912 (May 22, 2025).

²⁷ Exec. Order No. 14154 of January 20, 2025, *Unleashing American Energy*, 90 Fed. Reg. 8353, 8357 (Jan. 29, 2025), <https://www.govinfo.gov/content/pkg/FR-2025-01-29/pdf/2025-01956.pdf> [hereinafter E.O. 14154] (directing the Secretary of Energy to “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 [non-FTA] application”); *see infra* § II.D.

²⁸ *Venture Global Plaquemines LNG, LLC*, DOE/FECM Order No. 3866-B.

natural gas price increases to the extent that they would negate the economic benefits to the United States.

To comply with the National Environmental Policy Act of 1969 (NEPA),²⁹ DOE is relying on a categorical exclusion from the preparation of an environmental impact statement (EIS) or environmental assessment (EA) under NEPA for the Application (Categorical Exclusion). Specifically, DOE is applying categorical exclusion B5.7, *Export of natural gas and associated transportation by marine vessel*.³⁰ This Order grants, without further review, the non-FTA portion of the Amendment Application on the basis of this Categorical Exclusion.

In sum, DOE grants the non-FTA portion of the Amendment Application in the full volume requested—165.33 Bcf/yr of natural gas, or approximately 0.45 Bcf per day (Bcf/d)—for a total export volume of 1,405.33 Bcf/yr, subject to the Terms and Conditions and Ordering Paragraphs set forth herein. Because the export volumes authorized in Plaquemines LNG’s FTA order and this Order reflect the maximum liquefaction capacity of the Project as approved by FERC, the non-FTA volume in this Order is not additive to Plaquemines LNG’s FTA order (DOE/FE Order No. 3866, as amended).

Additionally, the incremental amendment volume approved in this Order brings DOE’s cumulative total of approved non-FTA exports of LNG from the lower-48 states to 53.72 Bcf/d of natural gas (across 44 final orders).³¹

²⁹ 42 U.S.C. § 4321 *et seq.*

³⁰ See 10 C.F.R. Part 1021, Subpt. D, App. B, Categorical Exclusion B5.7; *see also* U.S. Dep’t of Energy, National Environmental Policy Act Implementing Procedures, Final Rule, 85 Fed. Reg. 78,197 (Dec. 4, 2020); *see infra* § II.C.

³¹ Final non-FTA orders that were later vacated or that expired are not included in this total volume. *See infra* § VIII.F (identifying long-term orders vacated and expired to date). Additionally, DOE has issued one final long-term order authorizing exports of LNG produced from sources from a proposed facility to be constructed in Alaska to non-FTA countries. *See Alaska LNG Project LLC*, DOE/FE Order No. 3643-A, Docket No. 14-96-LNG, Final Opinion and Order Granting Long-Term Authorization to Export Liquefied Natural Gas to Non-Free Trade Agreement Nations (Aug. 20, 2020) (as subsequently amended in DOE/FECM Order No. 3643-C); *see also Sierra*

II. BACKGROUND

A. DOE's Prior LNG Studies

Previously, DOE has relied on the following studies to inform its review of applications to export LNG to non-FTA countries under NGA section 3(a):

- DOE's economic study referred to as the 2018 LNG Export Study—the fifth economic study conducted by DOE for use in LNG export decisions—which assessed the effects of varying levels of LNG exports from the lower-48 states to non-FTA countries for the time period 2020-2050;³²
- DOE's environmental study referred to as the Addendum,³³ which was developed in 2014 to inform DOE's public interest evaluation on potential environmental impacts of unconventional natural gas exploration and production activities, including hydraulic fracturing; and
- DOE's environmental studies referred to as the 2014 Life Cycle Greenhouse Gas Report (or the LCA GHG Report)³⁴ and the 2019 LCA GHG Update (or the 2019 Update),³⁵ which calculated the life cycle greenhouse gas (GHG) emissions for LNG exported from the United States.

DOE commenced the 2024 LNG Export Study to provide an updated understanding of the potential effects of U.S. LNG exports on both economic and environmental considerations.³⁶ As

Club v. U.S. Dep't of Energy, 134 F.4th 568 (D.C. Cir. 2025) (denying petition for review of Alaska LNG order). The Alaska LNG volume (2.55 Bcf/d) is not included in the volumes discussed in this Order, which generally involve the export of LNG produced from the lower-48 states. Because there is no natural gas pipeline interconnection between Alaska and the lower-48 states, DOE generally views those LNG export markets as distinct.

³² See U.S. Dep't of Energy, Study on Macroeconomic Outcomes of LNG Exports; Notice of Availability of the 2018 LNG Export Study and Request for Comments, 83 Fed. Reg. 27,314 (June 12, 2018); U.S. Dep't of Energy, Study on Macroeconomic Outcomes of LNG Exports; Response to Comments Received on Study, 83 Fed. Reg. 67,251 (Dec. 28, 2018). Prior to the 2018 Study, DOE had relied on economic studies evaluating LNG exports conducted in 2011, 2012, 2014, and 2015. See *id.* at 67,254-55.

³³ See U.S. Dep't of Energy, Addendum to Environmental Review Documents Concerning Exports of Natural Gas From the United States, 79 Fed. Reg. 48,132 (Aug. 15, 2014); see also <https://www.energy.gov/hgeo/addendum-environmental-review-documents-concerning-exports-natural-gas-united-states> (related documents).

³⁴ See U.S. Dep't of Energy, Life Cycle Greenhouse Gas Perspective on Exporting Liquefied Natural Gas From the United States, 79 Fed. Reg. 32,260 (June 4, 2014). DOE announced the availability of this report on its website on May 29, 2014. "LCA" refers to the life cycle analysis (LCA) model used in DOE's greenhouse gas analyses.

³⁵ See, e.g., Nat'l Energy Tech. Lab., *Life Cycle Greenhouse Gas Perspective on Exporting Liquefied Natural Gas from the United States: 2019 Update* (DOE/NETL- 2019/2041) (Sep. 12, 2019), <https://www.energy.gov/sites/prod/files/2019/09/f66/2019%20NETL%20LCA-GHG%20Report.pdf>; U.S. Dep't of Energy, Life Cycle Greenhouse Gas Perspective on Exporting Liquefied Natural Gas From the United States; Notice of Availability of Report Entitled Life Cycle Greenhouse Gas Perspective on Exporting Liquefied Natural Gas From the United States: 2019 Update and Request for Comments, 84 Fed. Reg. 49,278 (Sep. 19, 2019).

³⁶ See *infra* § III.

explained below, DOE finds that only the economic and energy security portions of the 2024 Study are relevant to this proceeding.

B. Judicial Decisions Upholding DOE’s Non-FTA Authorizations

In 2015 and 2016, Sierra Club petitioned the U.S. Court of Appeals for the District of Columbia Circuit (D.C. Circuit) for review of five long-term LNG export authorizations issued by DOE. The D.C. Circuit denied four of the five petitions for review: one in a published decision issued in August 2017 (*Sierra Club I*),³⁷ and three in a consolidated, unpublished opinion issued in November 2017 (*Sierra Club II*).³⁸ Sierra Club withdrew its fifth and remaining petition for review.³⁹

In *Sierra Club I*, the D.C. Circuit concluded that DOE had complied with both NGA section 3(a) and NEPA in issuing the challenged non-FTA authorization to Freeport LNG Expansion, L.P. and its related entities (collectively, Freeport). DOE had granted the Freeport application, finding that Freeport’s proposed exports were not inconsistent with the public interest under NGA section 3(a). DOE also considered and disclosed the potential environmental impacts of its decision under NEPA. Sierra Club petitioned for review of the Freeport authorization, arguing that DOE fell short of its obligations under both the NGA and NEPA. The D.C. Circuit rejected Sierra Club’s arguments in a unanimous decision, holding that, “Sierra Club has given us no reason to question the Department’s judgment that the [Freeport] application is not inconsistent with the public interest.”⁴⁰

³⁷ *Sierra Club v. U.S. Dep’t of Energy*, 867 F.3d 189 (D.C. Cir. 2017) [hereinafter *Sierra Club I*] (denying petition for review of the LNG export authorization issued to Freeport LNG Expansion, L.P., *et al.*).

³⁸ *Sierra Club v. U.S. Dep’t of Energy*, 703 Fed. App’x 1 (D.C. Cir. 2017) [hereinafter *Sierra Club II*] (denying petitions for review in Nos. 16-1186, 16-1252, and 16-1253 of the LNG export authorizations issued to Dominion Cove Point LNG, LP; Sabine Pass Liquefaction, LLC; and Cheniere Marketing, LLC and Corpus Christi Liquefaction, LLC, respectively).

³⁹ *See Sierra Club v. U.S. Dep’t of Energy*, No. 16-1426, Per Curiam Order (D.C. Cir. 2018) (granting Sierra Club’s unopposed motion for voluntary dismissal).

⁴⁰ *Sierra Club I*, 867 F.3d at 203.

Subsequently, in the consolidated *Sierra Club II* opinion, the D.C. Circuit ruled that “[t]he court’s decision in [*Sierra Club I*] largely governs the resolution of the [three] instant cases.”⁴¹ Upon its review of the remaining “narrow issues” in those cases, the Court again rejected Sierra Club’s arguments under the NGA and NEPA, and upheld DOE’s actions in issuing the non-FTA authorizations in those proceedings.⁴²

The D.C. Circuit’s decisions in *Sierra Club I* and *II* continue to guide DOE’s review of applications to export LNG to non-FTA countries.⁴³

C. DOE’s Categorical Exclusion and Marine Transport Technical Support Document

In 2020, DOE revised its NEPA procedures that provide for a categorical exclusion if neither an EIS nor an EA is required—specifically, by promulgating a revised categorical exclusion B5.7, *Export of natural gas and associated transportation by marine vessel* (B5.7 categorical exclusion).⁴⁴

In the accompanying final rule, DOE stated that the revision to 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.”⁴⁵ DOE found that “[s]uch impacts begin at the point of export and are limited to the marine transport effects.”⁴⁶

⁴¹ *Sierra Club II*, 703 Fed. App’x at *2.

⁴² *Id.* For a more detailed discussion of *Sierra Club I* and *Sierra Club II*, see *Freeport LNG Expansion, L.P., et al.*, DOE/FECM Order No. 4961, Docket No. 21-98-LNG, Order Granting Long-Term Authorization to Export Liquefied Natural Gas to Non-Free Trade Agreement Nations, at 21-24 (Mar. 3, 2023).

⁴³ See, e.g., DOE/FECM Order No. 4961 at 24.

⁴⁴ See U.S. Dep’t of Energy, National Environmental Policy Act Implementing Procedures, Final Rule, 85 Fed. Reg. 78,197 (Dec. 4, 2020) [hereinafter NEPA Implementing Procedures Final Rule]; see also 10 C.F.R. Part 1021, Subpt. D, App. B, Categorical Exclusion B5.7.

⁴⁵ NEPA Implementing Procedures Final Rule, 85 Fed. Reg. at 78,197.

⁴⁶ *Id.* at 78,197; see also *id.* at 78,197 n.9 (“DOE defines export activities as starting at the point of delivery to the export vessel, and extending to the territorial waters of the receiving country.”); *id.* at 78,198 (“These potential impacts would occur at or after the point of export to non-FTA countries.”).

DOE explained that this revised categorical exclusion follows both the Supreme Court’s holding in *Department of Transportation v. Public Citizen (Public Citizen)*,⁴⁷ as well as the D.C. Circuit’s holding in a case evaluating FERC’s authority under the NGA, *Sierra Club v. Federal Energy Regulatory Commission*,⁴⁸ that “potential environmental effects considered under NEPA do not include effects that the agency has no authority to prevent.”⁴⁹

Specifically, DOE stated that its discretionary authority under NGA section 3 “is limited to the authorization of exports of natural gas to non-FTA countries.”⁵⁰ DOE thus concluded that, because FERC, not DOE, exercises statutory authority to authorize construction and operation of natural gas export facilities, “DOE need not review potential environmental impacts associated with the construction or operation of [such] facilities.”⁵¹ In observing that “*Public Citizen* held that an agency has no obligation to ‘gather or consider environmental information if it has no statutory authority to act on that information,’” DOE reiterated that “[t]his final rule is fully consistent with that holding.”⁵² In sum, “[i]mpacts beyond marine transport are beyond the scope of DOE’s NEPA review” in non-FTA export proceedings.⁵³

On the basis of data referenced in the accompanying Technical Support Document,⁵⁴ DOE concluded that “the transport of natural gas by marine vessels adhering to applicable

⁴⁷ *Dep’t of Transp. v. Pub. Citizen*, 541 U.S. 752 (2004) [hereinafter *Pub. Citizen*].

⁴⁸ *Sierra Club v. Fed. Energy Regul. Comm’n*, 827 F.3d 36 (D.C. Cir. 2016).

⁴⁹ NEPA Implementing Procedures Final Rule, 85 Fed. Reg. at 78,198.

⁵⁰ *Id.*

⁵¹ *Id.*; see also *id.* at 78,203.

⁵² *Id.* at 78,201 (quoting *Sierra Club v. Fed. Energy Regul. Comm’n*, 867 F.3d 1357, 1372 (D.C. Cir. 2017), in which the D.C. Circuit observed that this “rule was the touchstone of *Public Citizen*”); see also *Seven Cnty. Infrastructure Coal. v. Eagle Cnty., Colo.*, 605 U.S. 168, 188, 191 (2025) (citing *Pub. Citizen*, 541 U.S. at 770, in observing that “agencies are not required to analyze the effects of projects over which they do not exercise regulatory authority,” and that “[a]n agency may decline to evaluate environmental effects from separate projects upstream or downstream from the project at issue”).

⁵³ NEPA Implementing Procedures Final Rule, 85 Fed. Reg. at 78,200.

⁵⁴ See *id.* at 78,198 n.16 (citing 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), <https://www.energy.gov/sites/prod/files/2021/01/f82/technical-support-document-10-cfr-1021-2020-11.pdf>).

maritime safety regulations and established shipping methods and safety standards normally does not pose the potential for significant environmental impacts.”⁵⁵

D. Executive Order Issued on January 20, 2025

E.O. 14154, issued on January 20, 2025, directed the Secretary of Energy to “restart reviews of applications for approvals of [LNG] export projects as expeditiously as possible, consistent with applicable law.”⁵⁶ DOE complied with this directive with its issuance of non-FTA export authorizations beginning in February 2025.⁵⁷ Additionally, E.O. 14154 states that, “[i]n assessing the ‘Public Interest’ to be advanced by any particular application” to export LNG under NGA section 3(a), the Secretary of Energy “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.”⁵⁸ This Order likewise complies with that directive.

III. DOE’S 2024 LNG EXPORT STUDY

A. Overview

The 2024 LNG Export Study (or 2024 Study) was conducted as a comprehensive update of DOE’s prior LNG studies (discussed *supra* § II.A), and aimed to capture the recent and complex dynamics of the LNG export market. As a preliminary matter, DOE acknowledges that the 2024 Study included an environmental analysis. However, DOE finds that the environmental analysis in the 2024 Study is not required for DOE’s decision on the Amendment Application, as DOE’s NEPA review considers all relevant environmental effects from the proposed exports.⁵⁹

⁵⁵ *Id.* at 78,200; *see also id.* at 78,202.

⁵⁶ E.O. 14154, 90 Fed. Reg. at 8357 (§ 8(a)). Because DOE has jurisdiction to regulate exports of LNG under NGA section 3(a) (not approvals of export projects, which are under FERC’s jurisdiction), DOE interprets E.O. 14154 as directing DOE to review non-FTA export applications “as expeditiously as possible.”

⁵⁷ *See, e.g., Commonwealth LNG, LLC*, DOE/FECM Order No. 5238, Docket No. 19-134-LNG, Order Conditionally Granting Long-Term Authorization to Export Liquefied Natural Gas to Non-Free Trade Agreement Nations, at 7 (Feb. 14, 2025).

⁵⁸ E.O. 14154, 90 Fed. Reg. at 8357 (§ 8(a)).

⁵⁹ *See infra* § VIII.D.

Specifically, under DOE’s B5.7 categorical exclusion described above (and consistent with the Supreme Court’s holding in *Public Citizen* and, more recently, *Seven County Infrastructure Coalition v. Eagle County, Colorado (Seven County)*),⁶⁰ this NEPA review is limited to the “potential effects associated with marine transport of LNG” to non-FTA countries.⁶¹ The environmental portions of the 2024 Study were not limited to marine transport effects, but rather included the integration of potential upstream and downstream environmental effects, which are not reasonably foreseeable environmental impacts of DOE’s export authorizations.⁶² Accordingly, DOE’s discussion of the 2024 Study in this Order focuses only on the economic analysis in the 2024 Study, as well as DOE’s related findings on energy security.⁶³

B. Methodology

As relevant here, the 2024 Study included a Summary Report⁶⁴ and two appendices that provided more detail on the key elements within the Study.

First, *Appendix A: Global Energy and Greenhouse Gas Implications of U.S. LNG Exports* (Appendix A) presented, in relevant part, an analysis of the global market demand for U.S. LNG exports across a range of scenarios through 2050. This analysis used the Global Change

⁶⁰ See *supra* § II.C.

⁶¹ NEPA Implementing Procedures Final Rule, 85 Fed. Reg. at 78,199; see also *id.* at 78,197 (DOE’s NEPA review of applications to export LNG to non-FTA countries is based on “the legal principle that potential environmental effects to be considered by an agency under NEPA do not include effects that the agency has no authority to prevent”).

⁶² See *id.*, 85 Fed. Reg. at 78,199 (stating “DOE’s conclusion that potential environmental effects associated with marine transport” are “the only reasonably foreseeable environmental impacts associated with DOE natural gas export authorizations” under NEPA—and noting that these marine transport effects “are minimal”) (emphasis added); see also *id.* at 78,200-01 (explaining that potential upstream and downstream impacts are not part of DOE’s NEPA analyses for natural gas export approvals).

⁶³ This focus is also consistent with E.O. 14154 (*supra* § II.D), which directs DOE to review “economic and employment impacts to the United States and the impact to the security of allies and partners that would result from granting [an export] application.”

⁶⁴ U.S. Dep’t of Energy, Energy, Economic, and Environmental Assessment of U.S. LNG Exports: Summary Report (Dec. 2024) [hereinafter Study Summary Report], https://www.energy.gov/sites/default/files/2024-12/LNGUpdate_SummaryReport_Dec2024_230pm.pdf.

Analysis Model (GCAM), which is an integrated multisector model of global energy, economy, agriculture, land use, water, and climate systems. DOE's Pacific Northwest National Laboratory (PNNL) conducted the principal modeling work in Appendix A.⁶⁵

Second, *Appendix B: Domestic Energy, Economic, and Greenhouse Gas Assessment of U.S. LNG Exports* (Appendix B) presented an analysis of the implications of the various U.S. LNG export levels on the U.S. economy, among other considerations. The analysis in Appendix B was conducted using an updated and adapted version of the U.S. Energy Information Administration's (EIA) National Energy Modeling System (NEMS) and Industrial Economics, Inc.'s (IEc) Household Energy Impact Distribution Model (HEIDM). OnLocation, Inc. and IEc performed the principal modeling work in Appendix B.⁶⁶

For each scenario in these Appendices, GCAM was used to estimate the global demand for U.S. LNG exports.⁶⁷ These projections of the global demand for U.S. LNG for key scenarios were put into NEMS and HEIDM to evaluate domestic impacts, including: (i) changes in natural gas prices and consumption across economic sectors, and (ii) changes in energy prices experienced by American households.⁶⁸

The 2024 Study evaluated scenarios that analyzed a combination of assumptions about policy, technology availability, and U.S. LNG export levels.⁶⁹ Briefly:

- The 2024 Study contained three categories of policy assumptions: *Defined Policies*, *Commitments*, and *Net Zero 2050*.⁷⁰ For example, the *Defined Policies* scenario

⁶⁵ U.S. Dep't of Energy, *2024 LNG Export Study: Energy, Economic, and Environmental Assessment of U.S. LNG Exports*; Notice of Availability and Request for Comments, at 4 (Dec. 17, 2024), https://www.energy.gov/sites/default/files/2024-12/2024%20LNG%20Export%20Study%20FRN_signed_Study%20Statement%20Added%2012172024.pdf [hereinafter 2024 Study Notice].

⁶⁶ *Id.* at 4-5. The 2024 Study included two other appendices (Appendices C and D) focused on evaluating various environmental and community effects that are beyond the scope of DOE's review in this Order and thus are not summarized here.

⁶⁷ *Id.*

⁶⁸ *Id.*

⁶⁹ See Study Summary Report at S-15.

⁷⁰ *Id.*

included an explicit representation of domestic policies in place at the time.⁷¹

- The 2024 Study contained two categories of assumptions for technology availability: *High CCS* [Carbon Capture & Storage] and *Moderate CCS*.⁷²
- Within each scenario of policy and technology assumptions, the 2024 Study considered three assumptions of U.S. LNG exports levels: *Existing/FID Exports*, *Model Resolved Exports*, and *High Exports*.⁷³
 - *Existing/FID Exports* assumed U.S. LNG exports were held at levels equivalent to 90% of the LNG capacity that was operational or had export authorizations from DOE and reached a final investment decision (FID) as of December 2023 (23.7 Bcf/d).⁷⁴
 - *Model Resolved Exports* assumed U.S. LNG exports estimated at a trajectory determined by the model.⁷⁵
 - *High Exports* assumed U.S. LNG exports increased incrementally above *Model Resolved* levels starting in 2035 to reach 20 Bcf/d above *Model Resolved* levels in 2050.⁷⁶

Additionally, the 2024 Study explored three additional assumptions related to the economic competitiveness of U.S. natural gas: *High U.S. Supply*, *Low U.S. Supply*, and *High Middle East Supply*.⁷⁷ The analysis in Appendix B used only the levels of LNG exports derived under the global *Defined Policies* assumptions found in Appendix A, while varying the size of U.S. natural oil and gas supply and technological improvements in natural gas extraction.⁷⁸

In sum, using a combination of these assumptions, Appendix A evaluated 14 primary scenarios, as well as six additional sensitivity scenarios on economic competitiveness, and Appendix B evaluated six scenarios spanning a range of U.S. LNG export levels.⁷⁹

⁷¹ *Id.* at S-16.

⁷² *See id.* at S-17.

⁷³ *Id.* at S-18.

⁷⁴ *Id.*

⁷⁵ Study Summary Report at S-18.

⁷⁶ *Id.*

⁷⁷ *Id.* at S-19.

⁷⁸ *Id.*

⁷⁹ *See id.*

C. DOE Proceeding

On December 17, 2024, DOE published the notice of availability of the 2024 LNG Export Study on its website.⁸⁰ The Notice of Availability was published in the *Federal Register* on December 20, 2024.⁸¹ The Notice of Availability informed the public that DOE intended to use the 2024 Study to inform its public interest review in pending and future non-FTA applications, invited submission of comments regarding the use of the 2024 Study, and entered the 2024 Study into the administrative record of the 14 pending non-FTA export proceedings identified in the caption of the Notice of Availability.⁸²

DOE initially invited public comment on the 2024 Study for 60 days, but extended the comment period for an additional 30 days.⁸³ In total, the comment period began on December 20, 2024, and extended through March 20, 2025.⁸⁴ DOE received more than 100,000 comments on the 2024 Study from a variety of sources, including participants in the natural gas industry, industrial users, environmental organizations, think-tanks, academics, and individuals.⁸⁵

DOE summarized and responded to these comments in a document entitled *Energy, Economic, and Environmental Assessment of U.S. LNG Exports: Response to Comments* (Response to Comments), published on DOE's website on May 19, 2025.⁸⁶ On May 22, 2025, DOE published the Notice of Availability of the Response to Comments in the *Federal Register*.⁸⁷

⁸⁰ See 2024 Study Notice.

⁸¹ U.S. Dep't of Energy, *2024 LNG Export Study: Energy, Economic, and Environmental Assessment of U.S. LNG Exports*; Notice of Availability and Request for Comments, 89 Fed. Reg. 104,132 (Dec. 20, 2024).

⁸² See *id.*

⁸³ See U.S. Dep't of Energy, *2024 LNG Export Study: Energy, Economic, and Environmental Assessment of U.S. LNG Exports*; Extension of Comment Period, 90 Fed. Reg. 9018 (Feb. 5, 2025).

⁸⁴ *Id.*

⁸⁵ The public comments are posted on the 2024 LNG Export Study webpage at <https://fossil.energy.gov/app/docketindex/docket/index/30>.

⁸⁶ See Response to Comments.

⁸⁷ See Notice of Availability of Response to Comments.

D. DOE’s Findings and Conclusions

1. Key Findings

Upon consideration of the material reviewed (*i.e.*, the 2024 Study, comments, and materials submitted in support of comments), DOE made the following “Key Findings” in the Response to Comments on the 2024 Study, as relevant here:⁸⁸

1. U.S domestic natural gas supply is sufficient to meet domestic and market-based global demand for U.S. natural gas (including LNG).
2. Increasing U.S. LNG exports increases U.S. gross domestic product (GDP).
3. Higher levels of U.S. LNG exports will have a beneficial impact on the U.S. trade balance.
4. Increased LNG exports are projected to have relatively modest impacts on prices and there has not been a consistent effect of U.S. LNG exports on prices to date. 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, and those price impacts are below the price increases from U.S. LNG exports modeled in the 2018 LNG Export Study.
5. Increased U.S. LNG exports would enhance national and energy security for the United States, as well as U.S. allies and trading partners.

DOE determined that the public comments received on the 2024 Study “either support or do not provide a sufficient basis to invalidate or undermine these findings.”⁸⁹

⁸⁸ The 2024 Study, as summarized in the Response to Comments, included other Key Findings and Conclusions describing various environmental and community effects that are beyond the scope of DOE’s review in this Order and thus are omitted here and in the next subsection (§ III.D.2), respectively.

⁸⁹ Response to Comments at 47.

2. Conclusions

DOE conducted the 2024 LNG Export Study to identify and assess potential effects of continued expansion of U.S. LNG exports to non-FTA countries. As relevant here, DOE determined in the Response to Comments that the 2024 Study provides support for additional exports of U.S. LNG to non-FTA countries.⁹⁰ A primary conclusion of the 2024 Study—which DOE affirmed in the Response to Comments—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.”⁹¹

DOE further concluded that the export of LNG generates net economic benefits for the United States, including increasing GDP in all cases; has a beneficial impact on the U.S. trade balance; and enhances energy security for the United States and its allies and trading partners.⁹² For example, DOE found that the destination flexibility of its FTA and non-FTA authorizations—in which a buyer can deliver LNG to any destination not prohibited by law or policy—enhances global energy security, regardless of the destination region.⁹³

DOE also determined that LNG export levels to date have 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.”⁹⁴ As some commenters noted, and

⁹⁰ See, e.g., *id.* at 46-50.

⁹¹ *Id.* at 47; see also *id.* at 43 (observing 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”).

⁹² *Id.* at 46-49.

⁹³ *Id.* at 48; see also *id.* at 40 (stating that DOE “agrees that LNG exports from the United States contribute to global energy security” due to the destination flexibility of its export authorizations).

⁹⁴ *Id.* at 48; see also *id.* at 17 (stating that the “many simultaneous changes that have occurred in natural gas production and markets in recent years . . . make it challenging to parse out [the] separate effects” of U.S. export levels on domestic prices of natural gas).

DOE agreed, “natural gas supply curves used in modeling show the ability to add significant supply with only small changes in prices.”⁹⁵

DOE also stated that it continues to endorse the principle set forth in its 1984 Policy Guidelines⁹⁶ that the market is generally the most efficient means of allocating natural gas supplies. Specifically, DOE observed that market forces ultimately determine the success of any particular LNG export project and, in turn, the “market-derived level of U.S. LNG exports.”⁹⁷

DOE noted that technological innovations and industry investment are “two factors that influence market demand” for exports of U.S. LNG.⁹⁸

For all of these reasons, DOE concluded that the 2024 Study and the public comments received “support the proposition that exports of LNG from the United States will not be inconsistent with the public interest.”⁹⁹

IV. PUBLIC INTEREST STANDARD

Section 3(a) of the NGA sets forth the standard of review for the non-FTA portion of the Amendment Application:

[N]o person shall export any 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]¹⁰⁰ authorizing it to do so. The [Secretary] shall issue such order upon application, unless after opportunity for hearing, [the Secretary] 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,

⁹⁵ Response to Comments at 47.

⁹⁶ U.S. Dep’t of Energy, New Policy Guidelines and Delegation Orders Relating to the Regulation of Imported Natural Gas, 49 Fed. Reg. 6684 (Feb. 22, 1984) [hereinafter 1984 Policy Guidelines].

⁹⁷ See Response to Comments at 8-9 (noting that an authorization to export LNG “does not guarantee that any particular project will succeed”); see also *id.* at 42 (discussing market forces and changing market conditions).

⁹⁸ *Id.* at 50.

⁹⁹ *Id.*

¹⁰⁰ The Secretary’s authority was established by section 301(b) of the Department of Energy Organization Act, 42 U.S.C. § 7151(b), which transferred jurisdiction over import and export authorizations from the Federal Power Commission to the Secretary of Energy; see also *id.* § 7172(f) (section 402(f)).

with such modification and upon such terms and conditions as the [Secretary] may find necessary or appropriate.¹⁰¹

DOE, as affirmed by the D.C. Circuit, has consistently interpreted NGA section 3(a) as creating a rebuttable presumption that a proposed exportation of natural gas is in the public interest.¹⁰²

Accordingly, DOE will continue to conduct individual adjudications and grant non-FTA applications unless DOE finds that a proposed exportation “will not be consistent with the public interest.”¹⁰³

NGA section 3(a) does not define “public interest” or identify criteria that must be considered in evaluating the public interest. In evaluating an export application under this standard, DOE applies the principles described in DOE’s 1984 Policy Guidelines and “such other matters as [DOE] finds in the circumstances of a particular case to be appropriate,” including the domestic need for the natural gas to be exported.¹⁰⁴ The goals of the 1984 Policy Guidelines are to minimize federal control and involvement in energy markets and to promote a balanced and mixed energy resource system.¹⁰⁵ While the 1984 Policy Guidelines explicitly discuss only

¹⁰¹ 15 U.S.C. § 717b(a).

¹⁰² See *Sierra Club I*, 867 F.3d at 203 (“We have construed [NGA section 3(a)] as containing a ‘general presumption favoring [export] authorization.’”) (quoting *W. Va. Pub. Serv. Comm’n v. U.S. Dep’t of Energy*, 681 F.2d 847, 856 (D.C. Cir. 1982)).

¹⁰³ See *id.* (“there must be ‘an affirmative showing of inconsistency with the public interest’ to deny the application” under NGA section 3(a)) (quoting *Panhandle Producers & Royalty Owners Ass’n v. Econ. Regul. Admin.*, 822 F.2d 1105, 1111 (D.C. Cir. 1987)). As of August 24, 2018, qualifying small-scale exports of natural gas to non-FTA countries are deemed to be consistent with the public interest under NGA section 3(a). See 10 C.F.R. §§ 590.102(p), 590.208(a).

¹⁰⁴ DOE Delegation Order No. 0204-111 (Feb. 22, 1984), at 1 (¶ (b)); see also U.S. Dep’t of Energy, Order Denying Petition for Rulemaking on Exports of Liquefied Natural Gas, at 11-12 (July 18, 2023), <https://www.energy.gov/sites/default/files/2023-07/DOE%20Response%20to%20Sierra%20Club%27s%20Petition%20for%20Rulemaking%207.18.2023%20%28002%29.pdf>.

¹⁰⁵ 1984 Policy Guidelines, 49 Fed. Reg. at 6685 (stating that “[t]he market, not government, should determine the price and other contract terms of imported [or exported] natural gas,” and emphasizing the importance of “minimizing regulatory impediments to a freely operating market”).

natural gas imports, in 1999 DOE held in Order No. 1473 that the same Policy Guidelines should be applied to natural gas export applications.¹⁰⁶

Thus, DOE's review of non-FTA applications focuses on: (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.¹⁰⁷ To conduct this review, DOE looks to record evidence developed in the application proceeding.¹⁰⁸ Before issuing a final decision, DOE must also comply with NEPA.¹⁰⁹

V. DESCRIPTION OF REQUEST

As relevant here, Plaquemines LNG asks DOE to amend its long-term non-FTA authorization, Order No. 4446, as amended by Order No. 4446-A, to increase its approved LNG export volume from 1,240 Bcf/yr to 1,405.33 Bcf/yr of natural gas—an additional 165.33 Bcf/yr of natural gas.¹¹⁰ Plaquemines LNG states that this amendment, if granted, will align its non-FTA export volume with the Project's "increased peak liquefaction capacity," which was proposed to FERC at the time of the Amendment Application and which FERC has now approved.¹¹¹ For additional background information, DOE incorporates by reference Order No. 4446, as amended.

¹⁰⁶ *Phillips Alaska Natural Gas Corp., et al.*, DOE/FE Order No. 1473, Docket No. 96-99-LNG, Order Extending Authorization to Export Liquefied Natural Gas from Alaska at 14 (Apr. 2, 1999) (citing *Yukon Pac. Corp.*, DOE/FE Order No. 350, Order Granting Authorization to Export Liquefied Natural Gas From Alaska, 1 FE ¶ 70,259, at 71,128 (1989)).

¹⁰⁷ *See* DOE Order Denying Petition for Rulemaking at 12.

¹⁰⁸ *See id.*

¹⁰⁹ *See supra* § I.

¹¹⁰ *See* Amendment App. at 1-2; *see also supra* § I.

¹¹¹ Amendment App. at 8; *see also id.* at 2; *see also supra* § I.

A. Description of Applicant

Plaquemines LNG is a Delaware limited liability company with its primary place of business in Arlington, Virginia.¹¹² Plaquemines LNG states that it originally was a wholly-owned subsidiary of Venture Global LNG, Inc. (Venture Global LNG), a privately held Delaware corporation with the same principal place of business.¹¹³

At the time the Amendment Application was filed in March 2022, approximately 63.54% of the common equity in Venture Global LNG was held by Venture Global Partners, LLC (VG Partners), which in turn was owned and controlled by Robert B. Pender and Michael A. Sabel (Principals).¹¹⁴ The remaining 36.46% of the common equity in Venture Global LNG was collectively owned by a group of institutional investors, each owning only a small passive interest.¹¹⁵

On October 24, 2023, Venture Global LNG submitted a “Notification of Change in Ownership Structure,”¹¹⁶ which it subsequently supplemented.¹¹⁷ Venture Global LNG informed DOE of a corporate reorganization affecting the ownership of its three subsidiaries and authorization holders—Plaquemines LNG; Venture Global Calcasieu Pass, LLC; and Venture Global CP2 LNG, LLC¹¹⁸—in compliance with DOE’s Change in Control Procedures.¹¹⁹

Specifically, Venture Global LNG stated that, pursuant to a series of reorganization transactions effective as of September 25, 2023 (Transactions), Venture Global LNG became a

¹¹² Amendment App. at 4.

¹¹³ *Id.* at 5.

¹¹⁴ *See id.*

¹¹⁵ *Id.*

¹¹⁶ Venture Global Plaquemines LNG, LLC, *et al.*, Notification of Change in Ownership Structure, Docket Nos. 16-28-LNG, *et al.* (Oct. 24, 2023) [hereinafter Notification].

¹¹⁷ Venture Global Plaquemines LNG, LLC, *et al.*, Supplement to Notification of Change in Ownership Structure, Docket Nos. 16-28-LNG, *et al.* (Nov. 2, 2023).

¹¹⁸ *See* Notification at 1.

¹¹⁹ U.S. Dep’t of Energy, Procedures for Changes in Control Affecting Applications and Authorizations to Import or Export Natural Gas, 79 Fed. Reg. 65,541 (Nov. 5, 2014).

wholly-owned subsidiary of a new Delaware corporation named Venture Global Holdings, Inc. (VG Holdings), which has the same principal place of business as Venture Global LNG.¹²⁰ Following the Transactions, the Principals now own 83.79% of the common equity and voting power of VG Holdings, reflecting an increase in their ownership share of Venture Global LNG and Plaquemines LNG.¹²¹ Additionally, the Principals now hold their ownership interest in an entity named Venture Global Partners II, LLC, which is a Delaware limited liability company with the same principal place of business as Venture Global LNG.¹²²

Following the Transactions, the institutional investors now own a total of 16.21% of the common equity in VG Holdings, with funds managed and/or controlled by Pacific Investment Management LLC (PIMCO) owning 15.10%, and other passive institutional investors together owning the remaining 1.11%.¹²³

Venture Global LNG further stated that, after the Transactions, the Principals continue to retain the sole right to control and direct the management and policies of Venture Global LNG and thus Plaquemines LNG and the other authorization holders (other than certain rights with regard to Calcasieu Pass described in the Notification).¹²⁴

On May 24, 2024, DOE issued a letter responding to the Notification, as supplemented.¹²⁵ As relevant here, DOE acknowledged that the change in control described by Venture Global LNG in the Notification, as supplemented, had taken effect for the Amendment Application then-pending in this proceeding.¹²⁶

¹²⁰ Notification at 6.

¹²¹ *See, e.g.*, U.S. Dep't of Energy, Response to Notification of Change in Ownership Structure, Docket Nos. 16-28-LNG, *et al.*, at 4 (May 24, 2024) [hereinafter DOE Response to CIC].

¹²² *Id.*

¹²³ *Id.* at 4-5.

¹²⁴ *Id.* at 5 & n.28.

¹²⁵ *See supra* note 121.

¹²⁶ DOE Response to CIC at 6-7.

B. Project Updates

In the Amendment Application, Plaquemines LNG provides several updates about the Project.¹²⁷ Additionally, we note that, on October 1, 2025, Plaquemine LNG submitted its most recent semi-annual report to DOE (Semi-Annual Report), in which it provided additional updates.¹²⁸

As of the date of the Amendment Application, Plaquemines LNG states that it has entered into binding, long-term LNG sale and purchase agreements (SPAs) for a total of 13 mtpa of LNG with five companies: POLSKIE GÓRNICtwo NAFTOWE I GAZOWNICTwo SPÓŁKA AKCYJNA (PGNiG, and now known as Orlen S.A.); Électricité de France, S.A.; China Petroleum & Chemical Corp.; CNOOC Gas and Power Singapore Trading & Marketing Pte. Ltd.; and Shell NA LNG LLC.¹²⁹ Plaquemines LNG states that it has also entered into another long-term SPA for the available annual quantities in excess of the nameplate capacity.¹³⁰ In its Semi-Annual Report, Plaquemines LNG adds that it has now “entered into binding, long-term LNG Sales and Purchase Agreements for all of the Project’s 20 MTPA nameplate capacity.”¹³¹ Plaquemines LNG further states that it has filed all of its long-term SPAs with DOE in accordance with the requirements of its export authorizations and DOE policies.¹³²

Plaquemines LNG states that construction on the Terminal site commenced on August 18, 2021,¹³³ and that it “is proceeding with construction and commissioning as the work is authorized” by FERC.¹³⁴ Plaquemines LNG further states that, on May 25, 2022, Venture

¹²⁷ See Amendment App. at 6-8.

¹²⁸ Venture Global Plaquemines LNG, LLC, Semi-Annual Status Report, Docket No. 16-28-LNG, at 4 (Oct. 1, 2025) [hereinafter Plaquemines LNG Oct. 2025 Semi-Annual Report].

¹²⁹ Amendment App. at 6.

¹³⁰ *Id.* at 6-7.

¹³¹ Plaquemines LNG Oct. 2025 Semi-Annual Report.

¹³² Amendment App. at 7; *see also* Plaquemines LNG Oct. 2025 Semi-Annual Report at 4.

¹³³ Amendment App. at 7.

¹³⁴ Plaquemines LNG Oct. 2025 Semi-Annual Report at 2.

Global LNG announced the final investment decision (FID) for the initial 13.33 mtpa phase of the Plaquemines LNG Project (and the affiliated Gator Express Pipeline), followed on March 13, 2023, by its announcement of the FID for the second phase of the Project.¹³⁵ Finally, Plaquemines LNG states that it began producing LNG in December 2024 and exported its first commissioning cargo on December 26, 2024, as reported to DOE in a notification submitted on January 8, 2025.¹³⁶

VI. APPLICANT’S PUBLIC INTEREST ANALYSIS

A. Overview

Plaquemines LNG states that NGA section 3(a) creates a presumption that its proposed non-FTA exports are in the public interest, which opponents bear the burden of overcoming.¹³⁷ Plaquemines LNG further states that DOE “fully analyzed all relevant factors and concluded in DOE/FE Order No. 4446 that exports from the Plaquemines LNG Project to non-FTA nations are consistent with the public interest.”¹³⁸ According to Plaquemines LNG, “[i]ncreasing the quantity of the authorized exports to reflect a better, more refined understanding of the peak output of the facilities is equally consistent with the public interest.”¹³⁹

B. Domestic Natural Gas Supply and Demand

Plaquemines LNG asserts that “[d]omestic natural gas resources are abundant, environmentally friendly, and affordable, and are sufficient to meet both the domestic consumption demand and any expected level of LNG exports, including the increased volumes proposed by Plaquemines LNG, in the long-term.”¹⁴⁰ Citing projections by EIA, Plaquemines

¹³⁵ *Id.*

¹³⁶ *See id.* at 3; *see also supra* § I.

¹³⁷ Amendment App. at 12.

¹³⁸ *Id.*

¹³⁹ *Id.* (noting that Plaquemines LNG is seeking to increase its export volume “with no need for any additional facilities”).

¹⁴⁰ *Id.* at 19.

LNG states that domestic production has increased and should continue to increase, and that proven reserves have dramatically increased as well.¹⁴¹ Pointing to EIA’s *Annual Energy Outlook 2022* (AEO 2022)—the most recent data from EIA at the time of the Amendment Application—Plaquemines LNG states that total U.S. dry natural gas production will exceed domestic natural gas consumption through 2050.¹⁴² Thus, according to Plaquemines LNG, “[t]he abundant reserves and growing surplus of natural gas production over consumption sets the stage for the U.S. to continue to be a major exporter of natural gas.”¹⁴³

C. Effects on Domestic Prices of Natural Gas

Citing EIA’s projections in AEO 2022, Plaquemines LNG states that “EIA projects . . . low natural gas prices returning soon” (following a short-term increase in 2021 and in early 2022), “then continuing throughout the period of the requested export authorization through 2050.”¹⁴⁴ Plaquemines LNG thus contends that “the projections in AEO 2022 are even more supportive of LNG exports” than EIA’s pricing data relied upon by DOE in its 2018 LNG Export Study.¹⁴⁵

D. Economic Benefits

Plaquemines LNG notes that DOE has previously concluded in many export authorizations—including in Order No. 4446, as amended—that exports of U.S. LNG result in net economic benefits.¹⁴⁶ According to Plaquemines LNG, the macroeconomic benefits associated with the Project demonstrate that its proposed increase in exports is consistent with,

¹⁴¹ See *id.* at 19-20.

¹⁴² *Id.* at 20 (citing U.S. Energy Info. Admin., *Annual Energy Outlook 2022* (Mar. 3, 2022), at Table 13). Each Annual Energy Outlook (AEO) presents EIA’s long-term projections of energy supply, demand, and prices, based on results from EIA’s NEMS model.

¹⁴³ Amendment App. at 20.

¹⁴⁴ *Id.* at 22.

¹⁴⁵ *Id.*; see also *id.* at 23.

¹⁴⁶ *Id.* at 25.

and will promote, the public interest.¹⁴⁷ Plaquemines LNG further states that the Project “will benefit the economy by creating jobs, increasing tax revenues, and reducing the nation’s trade deficit.”¹⁴⁸

E. International Trade and Geopolitical Benefits

Citing DOE’s findings in other authorizations, including in Order No. 4446, Plaquemines LNG contends that “[i]ncreased access to U.S. natural gas not only provides new supplies to U.S. allies and trade partners around the world, but also positions the country as an alternative to traditional suppliers in Russia and the Middle East.”¹⁴⁹ Plaquemines LNG maintains that recent events have heightened the widespread understanding of the “crucial geopolitical benefits of U.S. LNG,” citing the events leading up to and following Russia’s invasion of Ukraine.¹⁵⁰

VII. CURRENT PROCEEDING BEFORE DOE

In response to the Notice of Application, DOE received two timely-filed motions to intervene and protest, filed by Public Citizen and Environmental Intervenors, respectively; as well as three timely-filed comments opposing the Amendment Application, filed by Anonymous, Christopher Lish, and Sierra Club’s Beyond Dirty Fuels Campaign, respectively. Subsequently, Plaquemines LNG submitted its Answer to the Protests.¹⁵¹ These filings are summarized below.

A. Public Comments

Mr. Lish states that he is strongly opposed to Plaquemines LNG’s requested amendment to its LNG exports authorization due to his concerns about the exportation of fossil fuels and alleged harms to the environment and nearby residents of the Plaquemines LNG Project.

Mr. Lish first argues that the Project site on the Louisiana coast is vulnerable to

¹⁴⁷ *See id.*

¹⁴⁸ *Id.*

¹⁴⁹ Amendment App. at 26.

¹⁵⁰ *Id.* at 27.

¹⁵¹ *See supra* § I.

storms.¹⁵² He asserts that “[t]he exact area where [the] Plaquemines LNG facility is being constructed was flooded . . . in 2021 during Hurricane Ida and water remained in the location for a number of weeks.”¹⁵³ According to Mr. Lish, expert analysis of the Project’s proposed flood walls found “critical deficiencies.”¹⁵⁴

Next, Mr. Lish asserts that the Project would cause expansion of natural gas drilling and hydraulic fracturing, which would “further lock-in fossil fuel dependence, exacerbate the climate crisis, increase vessel traffic and the risk of harmful pollution events and other accidents, and increase toxic air and water pollution” in a region already overburdened by the fossil fuel industry’s impacts.¹⁵⁵

Additionally, Mr. Lish contends that “[t]he health and wellbeing of residents of the Gulf Coast must be our top priority.”¹⁵⁶ He argues the Project is not in the public interest as it would cause environmental degradation, adverse public health impacts, and economic instability.¹⁵⁷ More broadly, according to Mr. Lish, “numerous projects for LNG would individually and together have negative impacts on climate, air and water quality, coastal and marine ecosystems and wildlife, frontline communities, public health, and environmental justice.”¹⁵⁸

In the comment submitted by Sierra Club’s Beyond Dirty Fuels Campaign (and signed by 7242 people), Sierra Club raises several of the same concerns as Mr. Lish.¹⁵⁹ For example, the Sierra Club commenters assert that “[t]he exportation of fossil fuels and the facilities that make it possible are ravaging the Louisiana coast in areas already vulnerable to storms.”¹⁶⁰ The Sierra

¹⁵² See Lish Comment at 1.

¹⁵³ *Id.*

¹⁵⁴ *Id.*

¹⁵⁵ *Id.* at 2.

¹⁵⁶ *Id.*

¹⁵⁷ *Id.*

¹⁵⁸ Lish Comment at 2.

¹⁵⁹ See Sierra Club Beyond Dirty Fuels Comment at 1.

¹⁶⁰ *Id.*

Club commenters and Mr. Lish also argue that, “despite messaging that LNG will aid Europe to gain independence from Russian fossil fuels,” this Project “will not begin exporting LNG for years, after Europe’s short-term needs have passed.”¹⁶¹

Finally, although not addressing Plaquemines LNG’s requested amendment directly, the Anonymous commenter contends that natural gas is a domestic resource that should not be treated as a commodity and exported.¹⁶²

B. Public Citizen’s Motion to Intervene and Protest

In support of its motion to intervene filed on July 11, 2022, Public Citizen states that it is a national, not-for-profit, non-partisan research and advocacy organization representing the interests of household consumers.¹⁶³ Public Citizen states that it has an interest in any proceeding involving the export of natural gas, as “unprecedented volumes of such exports are directly causing record high domestic natural gas prices, resulting in tens of millions of American families to endure sustained energy poverty hardship.”¹⁶⁴

Turning to its protest, Public Citizen asserts that Plaquemines LNG’s requested increase in its approved export volume is not in the public interest.¹⁶⁵ Public Citizen claims that the “record” exports of U.S. LNG in recent years are “radically upending domestic natural gas markets, resulting in a direct and punishing correlation between exports and increased energy price burdens for American families.”¹⁶⁶ Specifically, Public Citizen points to the June 2022 explosion at the Freeport LNG facility in Texas, stating that domestic natural gas prices fell following the explosion because natural gas that would have supplied the Freeport LNG facility

¹⁶¹ *Id.*; see also Lish Comment at 1.

¹⁶² Anon. Comment at 1.

¹⁶³ Public Citizen Pleading at 1.

¹⁶⁴ *Id.*

¹⁶⁵ *Id.*

¹⁶⁶ *Id.*

suddenly became available in the domestic market when the facility went offline.¹⁶⁷ Public Citizen argues that expanding Plaquemines LNG’s authorized export volume “needlessly exposes” the U.S. economy to significant harm in the form of continued energy price risk, and thus DOE must conclude that Plaquemines LNG’s proposed exports are not in the public interest.¹⁶⁸

C. Sierra Club and Healthy Gulf’s Joint Motion to Intervene and Protest

In support of their motion to intervene filed on July 11, 2022, Sierra Club and Healthy Gulf (collectively, Environmental Intervenors) state that their “interests [in the proceeding] are based on the impact the proposed additional exports will have on [their] members and mission.”¹⁶⁹ First, Environmental Intervenors assert that Plaquemines LNG’s proposed exports would harm their members by increasing the prices they pay for energy, including both natural gas and electricity, because (in their view) “each marginal increase in export volumes is also expected to further increase domestic energy prices.”¹⁷⁰ Second, Environmental Intervenors state that the increased exports will harm their members by increasing natural gas production and associated air pollution, including emissions of GHGs and ozone precursors.¹⁷¹ Additionally, Environmental Intervenors contend that increasing export volumes will increase shipping traffic beyond levels that would otherwise occur.¹⁷² Environmental Intervenors argue that this additional shipping will increase air pollution and harm wildlife that their members enjoy viewing, including the threatened giant manta ray, threatened oceanic whitetip shark, and endangered Rice’s whale.¹⁷³ Finally, Environmental Intervenors add that “[p]roposals, such as

¹⁶⁷ *Id.* at 1-2 (citing Seb Kennedy, “US LNG is becoming a zero-sum game,” *Energy Flux* (July 5, 2022)).

¹⁶⁸ *Id.* at 2.

¹⁶⁹ Enviro. Intervenors Pleading at 2.

¹⁷⁰ *Id.*

¹⁷¹ *Id.*

¹⁷² *Id.* at 3.

¹⁷³ *Id.* (citations omitted).

this one, that encourage long-term use of carbon-intensive fossil fuels will increase and prolong greenhouse gas emissions, increasing the severity of climate change and [other] harms.”¹⁷⁴

In protesting the Amendment Application, Environmental Intervenors contend that Plaquemines LNG’s requested increase in its non-FTA export volume is contrary to the public interest and should be denied for several reasons, as summarized below.¹⁷⁵

Global strategic interests. Environmental Intervenors acknowledge that, when DOE conducts its public interest review of a non-FTA application under NGA section 3(a), DOE considers global strategic concerns. Addressing “recent events in Ukraine,” Environmental Intervenors contend that the proposed Plaquemines LNG expansion “will not provide *any* help in reducing reliance on Russian gas in the short term” due to the Project’s construction schedule.¹⁷⁶ According to Environmental Intervenors, export capacity that will become available several years from now will “not address the immediate energy needs of Europe, the United States, or other energy consumers.”¹⁷⁷ Nor, Environmental Intervenors assert, is the Plaquemines LNG expansion “needed in the medium or long term, or for the next crisis,” as “better solutions are available” for these non-immediate needs.¹⁷⁸ Environmental Intervenors point to the use of heat pumps, building efficiency, and similar measures as tools that can “significantly reduce” the European Union’s natural gas use—and thus the impact of Russian energy.¹⁷⁹

Environmental Intervenors also maintain that there is no “strategic need” for additional export capacity beyond what DOE has already approved for Venture Global, and no need for

¹⁷⁴ *Id.* (discussing alleged harms from climate change including rising sea levels, extreme weather events, and increased wildfires).

¹⁷⁵ Enviro. Intervenors Pleading at 4.

¹⁷⁶ *Id.* at 5 (emphasis in original).

¹⁷⁷ *Id.*

¹⁷⁸ *Id.*

¹⁷⁹ *Id.* at 5-6 (citing, *e.g.*, a report issued by the International Energy Agency in March 2022 recommending a plan to reduce the EU’s reliance on Russian natural gas).

capacity beyond the existing approved projects that have not yet been constructed or become operational.¹⁸⁰ Environmental Intervenors state that “these not yet-operational facilities have a combined capacity of over 30 bcf/d, nearly three times the volume of US LNG exports [that] EIA predicts for 2022.”¹⁸¹

Environmental Intervenors thus conclude that “[r]ecent events in Ukraine have demonstrated yet another reason why the world needs to transition away from fossil energy as quickly as possible,” and that the requested amendment is “not part of a solution to current geopolitical problems.”¹⁸²

Domestic energy prices and supply. Next, Environmental Intervenors assert that “[t]he price impacts of LNG exports are harming Americans *now*,” as price spikes in the winter of 2021-22 demonstrated.¹⁸³ According to Environmental Intervenors, several reputable sources “agreed that LNG exports were driving up domestic gas prices,”¹⁸⁴ and that “[t]hese price increases harm both households and industrial energy consumers.”¹⁸⁵ For example, Environmental Intervenors cite EIA’s projection “that homes that use [natural] gas for heat would spend 30% more in the winter of 2021-2022 than they spent the prior winter.”¹⁸⁶ Environmental Intervenors maintain that, “[f]rom an economic perspective, LNG exports are simply making most Americans worse off.”¹⁸⁷

Environmental Intervenors further contend that DOE must address distributional aspects

¹⁸⁰ *Id.* at 6.

¹⁸¹ Enviro. Intervenors Pleading at 6 & n.23 (citing FERC, North American LNG Export Terminals (Feb. 17, 2022), <https://cms.ferc.gov/media/north-american-lng-export-terminals>).

¹⁸² *Id.* at 27.

¹⁸³ *Id.* at 6-7 (emphasis in original).

¹⁸⁴ *Id.*

¹⁸⁵ *Id.* at 8.

¹⁸⁶ *Id.*

¹⁸⁷ Enviro. Intervenors Pleading at 8.

of potential natural gas price impacts.¹⁸⁸ Environmental Intervenors argue that DOE has never grappled with the distributional impacts of LNG exports, beyond acknowledging that LNG exports have some positive and some negative economic impacts.¹⁸⁹ Pointing to statements by IECA and others, Environmental Intervenors maintain that “all Americans must pay energy bills, but few own shares (even indirectly, through pension plans and the like) in the gas companies that are benefiting from high gas prices and LNG sales.”¹⁹⁰ Environmental Intervenors thus emphasize that the “distributional and equity impacts of export-driven gas price increases require careful consideration,” so that all consumers are protected through reasonable natural gas prices as contemplated by the NGA.¹⁹¹

Environmental impacts. Turning to environmental issues, Environmental Intervenors argue that Plaquemines LNG’s proposed increase in exports will cause environmental harm occurring across the entire LNG lifecycle, which both the NGA and NEPA require DOE to consider.¹⁹²

According to Environmental Intervenors, Plaquemines LNG’s proposed exports cannot qualify for DOE’s categorical exclusion B5.7, *Export of natural gas and associated transportation by marine vessel*.¹⁹³ Environmental Intervenors argue that this revised categorical exclusion is arbitrary, capricious and contrary to law.¹⁹⁴ Specifically, Environmental Intervenors state that, “in promulgating the 2020 exclusion, DOE improperly excluded from NEPA review

¹⁸⁸ *Id.* at 8-10.

¹⁸⁹ *Id.* at 9.

¹⁹⁰ *Id.* at 8 (citations omitted).

¹⁹¹ *Id.* at 9-10 (citing *Minisink Residents for Env’tl. Pres. & Safety v. Fed. Energy Regul. Comm’n*, 762 F.3d 97, 101 (D.C. Cir. 2014)).

¹⁹² *See id.* at 10.

¹⁹³ Enviro. Intervenors Pleading at 12. Environmental Intervenors reference 10 C.F.R. Part 1021, Subpt. D, App. B, Categorical Exclusion B5.7, and DOE’s associated rulemaking (*see* U.S. Dep’t of Energy, National Environmental Policy Act Implementing Procedures, Final Rule, 85 Fed. Reg. 78,197 (Dec. 4, 2020)); *see also supra* § II.C.

¹⁹⁴ Enviro. Intervenors Pleading at 12.

all impacts occurring upstream of the point of export, based on a basic and fundamental legal error.”¹⁹⁵ Environmental Intervenors claim that, because DOE has authority to consider “the impacts of export-induced natural gas production,” the revised B5.7 categorical exclusion “was adopted unlawfully, cannot be relied upon here, and provides no evidence to suggest that all environmental effects occurring before the point of exports will be insignificant.”¹⁹⁶ Similarly, Environmental Intervenors argue that DOE’s treatment of downstream impacts under the revised B5.7 categorical exclusion was also arbitrary. According to Environmental Intervenors, DOE asserted that some downstream impacts are outside of DOE’s scope of NEPA analysis (e.g., downstream impacts relating to regasification and use of exported natural gas) when, in fact, “DOE has authority to consider these impacts when making its public interest determination.”¹⁹⁷

Environmental Intervenors further add that DOE “cannot invoke a categorical exclusion” for Plaquemines LNG’s Amendment Application “without determining that the proposed action has the ‘integral elements’ of excluded actions as defined in Appendix B to 10 C.F.R. Part 2021.”¹⁹⁸ According to Environmental Intervenors, the Amendment Application does not satisfy “integral element 1” (among others) because it “threaten[s] a violation of Executive Order 14008, *Tackling the Climate Crisis at Home and Abroad*” (then in effect).¹⁹⁹

Next, Environmental Intervenors maintain that DOE’s prior life cycle analyses evaluating GHG impacts associated with LNG exports “are not a substitute for NEPA review” and do not demonstrate that GHG emissions caused by Plaquemines LNG’s proposed increased exports are

¹⁹⁵ *Id.* (emphasis in original)

¹⁹⁶ *Id.* at 13 (citing, e.g., *Sierra Club v. Fed. Energy Regul. Comm’n*, 827 F.3d at 40-41, 46)).

¹⁹⁷ *Id.* at 14.

¹⁹⁸ *Id.* at 15.

¹⁹⁹ *Id.* (citing Exec. Order No. 14008 of Jan. 27, 2021, *Tackling the Climate Crisis at Home and Abroad*, 86 Fed. Reg. 7619 (Feb. 1, 2021)). Executive Order No. 14148 of Jan. 20, 2025, *Initial Rescissions of Harmful Executive Orders and Actions*, rescinded Exec. Order No. 14008. See 90 Fed. Reg. 8237, 8238 (Jan. 28, 2025).

consistent with the public interest.²⁰⁰ Environmental Intervenors maintain that, although DOE’s life cycle analyses may inform NEPA review, “DOE must address the impacts of [the Amendment Application] and other LNG proposals within the NEPA framework.”²⁰¹

Environmental Intervenors also argue that DOE’s prior life cycle analyses “ask the wrong questions” by looking only to the “short term.”²⁰² Environmental Intervenors assert that any such life cycle analysis must include a “discussion of whether increasing LNG exports will help or hinder achievement of the long-term drastic emission reductions that are essential to avoiding the most catastrophic levels of climate change” over an export term lasting through the year 2050.²⁰³ Environmental Intervenors further contend that natural gas production emits greater amounts of methane than what DOE’s prior analyses have assumed.²⁰⁴ For these and other reasons, Environmental Intervenors argue that DOE must revisit its prior life cycle analyses and take a “hard look at the climate impact of increasing U.S. LNG exports,” including considering both the impact of such exports on domestic emissions and reasonable forecasting about global impacts, such as U.S. goals for reducing GHG emissions.²⁰⁵

D. Plaquemines LNG’s Answer

In its Answer, Plaquemines LNG contends that the protestors “fall far short” of demonstrating that the proposed exports are inconsistent with the public interest, as would be required to overcome the presumption in favor of granting the Amendment Application under NGA section 3(a).²⁰⁶ Specifically, Plaquemines LNG states that the protests “present very general opposition to the export of LNG from the U.S., and challenge long-established

²⁰⁰ Enviro. Intervenors Pleading at 17 (section heading).

²⁰¹ *Id.*

²⁰² *Id.*

²⁰³ *Id.*

²⁰⁴ *See id.* at 19.

²⁰⁵ *Id.*

²⁰⁶ Plaquemines LNG Answer at 3.

DOE/FECM policies,” with “little to no focus” on Plaquemines LNG’s requested increase in authorized export volumes without any change in the Project facilities.²⁰⁷ Plaquemines LNG adds that many of the arguments in the protests “have been consistently rejected by DOE/FECM in numerous decisions over more than a decade through three presidential administrations.”²⁰⁸

Next, Plaquemines LNG argues that the global need for “abundant, low-cost, and clean-burning” U.S. LNG is clear, and the “economic, geopolitical, and environmental benefits” of such exports are “manifestly in the public interest.”²⁰⁹ Plaquemines LNG focuses on the energy security concerns in Europe following Russia’s invasion of Ukraine, rejecting Environmental Intervenors’ contention that LNG exports from the Project will not help in reducing reliance on Russian natural gas in the short term.²¹⁰ Among its arguments disputing this claim, Plaquemines LNG states that “the geopolitical importance of U.S. natural gas supplies has been highlighted and dramatically reinforced” by Russia’s invasion of Ukraine, with Plaquemines LNG’s contracts for the Project providing “actual, real world evidence” of Europe’s continued need for U.S. LNG.²¹¹ Specifically, Plaquemines LNG points to its existing SPA with the Polish Oil and Gas Company, PGNiG (now Orlen S.A.), as well as its European customers including EnBW Energie Baden-Württemberg AG, BP, Shell, Repsol, Edison, and GALP.²¹²

Plaquemines LNG also refutes Environmental Intervenors’ argument that there is no strategic need for additional LNG export capacity beyond that provided by existing facilities.²¹³

²⁰⁷ *Id.* at 4.

²⁰⁸ *Id.*

²⁰⁹ *Id.* at 5.

²¹⁰ *See id.* at 6-9.

²¹¹ *Id.* at 7-8

²¹² Plaquemines LNG Answer at 7.

²¹³ *Id.* at 9.

Plaquemines LNG notes that its Project is already under construction and that its requested amendment would not require new or modified facilities.²¹⁴

Next, Plaquemines LNG contends that LNG exports have well-established macroeconomic benefits and asserts that Environmental Intervenors have “never accepted the conclusions” of DOE’s prior studies identifying these benefits.²¹⁵ In particular, Plaquemines LNG argues that Environmental Intervenors continue to emphasize the distributional impacts of LNG exports, without acknowledging that DOE has consistently rejected these arguments over the years, including in proceedings in which the D.C. Circuit ruled in DOE’s favor on this issue.²¹⁶

Plaquemines LNG argues that Environmental Intervenors and Public Citizen both “emphasize recent [2022-era] increases in domestic natural gas prices in their effort to oppose the Amendment Application.”²¹⁷ Plaquemines LNG maintains, however, that the increased prices for domestic natural gas in 2021 and 2022 were due to numerous factors including weather disruptions, low inventories, demand rebounding faster than supply following the pandemic, and the “extraordinary events leading up to and following Russia’s invasion of Ukraine.”²¹⁸ Citing EIA’s projections, Plaquemines LNG argues that these price increases will be short-lived, noting that projected prices have in more recent projections fallen sharply.²¹⁹ Plaquemines LNG further states that “the more recent EIA pricing data is even more supportive of LNG exports,” and “the evidence continues to demonstrate that arguments against LNG

²¹⁴ *Id.* at 9-10.

²¹⁵ *Id.* at 10.

²¹⁶ *Id.* at 11 (citing, *e.g.*, *Sierra Club v. U.S. Dep’t of Energy*, Nos. 16-1186, 16-1252, 16-1253, 703 Fed. Appx. 1, at *3 (D.C. Cir. Nov. 1, 2017)).

²¹⁷ *Id.* at 12.

²¹⁸ Plaquemines LNG Answer at 14.

²¹⁹ *Id.* at 15.

exports based on misplaced concerns about insufficient supplies or domestic natural gas prices are baseless.”²²⁰

Plaquemines LNG also downplays Public Citizen’s concerns about domestic price reactions related to the June 2022 outage at the Freeport LNG Facility, noting that the sudden and unexpected outage event “reveals nothing about the relevant issue of the expected long-term impact of LNG exports on domestic prices.”²²¹ Plaquemines LNG counters that, due to abundant U.S. natural gas supplies and a projected decline in U.S. consumption, domestic resources are “more than sufficient to supply all domestic needs as well as serve U.S. allies and trade partners with growing supplies of urgently needed natural gas.”²²²

Finally, turning to Environmental Intervenors’ environmental concerns, and specifically the argument that the Amendment Application “should not be categorically [excluded] from review under NEPA,” Plaquemines LNG emphasizes that FERC is conducting NEPA review of the Project’s uprate amendment.²²³ Plaquemines LNG also reiterates that its proposed amendment does not involve new facilities or land disturbances.²²⁴

Responding to Environmental Intervenors’ arguments on GHG issues, Plaquemines LNG emphasizes the benefits of “encouraging the use of more environmentally friendly natural gas . . . as opposed to coal, diesel or heavy fuel oil used in other countries.”²²⁵ Plaquemines LNG states that “[t]his conclusion is bolstered by statements of the off-take customers that have contracted with Plaquemines LNG emphasizing the benefits of U.S. gas supply to their long-term climate and carbon emissions goals.”²²⁶

²²⁰ *Id.*

²²¹ *Id.* at 17.

²²² *Id.* at 17-18 (citing EIA projections).

²²³ *Id.* at 18.

²²⁴ Plaquemines LNG Answer at 18.

²²⁵ *Id.* at 20.

²²⁶ *Id.*

For these and other reasons discussed in the Answer, Plaquemines LNG asks DOE to “reject the arguments by the protesting parties and recognize that authorizing the increased amount of LNG exports . . . is unquestionably not inconsistent with the public interest.”²²⁷

VIII. DISCUSSION AND CONCLUSIONS

In reviewing the non-FTA portion of Plaquemines LNG’s Amendment Application, DOE has considered its obligations under NGA section 3(a) and NEPA, as well as the directives of E.O. 14154. To accomplish these purposes, DOE has examined a range of information addressing economic and non-economic factors, including but not limited to:

- Plaquemines LNG’s Amendment Application;
- The Motions to Intervene and Protests filed by Public Citizen and Environmental Intervenors, and Plaquemines LNG’s Answer thereto;
- The comments opposing the Amendment Application; and
- Relevant portions of the 2024 LNG Export Study, including comments received in response to the 2024 Study.

A. Procedural Matters

Plaquemines LNG did not oppose the motions to intervene filed by Public Citizen and Environmental Intervenors, respectively. Therefore, both motions are deemed granted by operation of law.²²⁸

B. Economic Issues

1. Significance of the 2024 LNG Export Study on Economic Issues

As discussed above, DOE commissioned the 2024 LNG Export Study and invited public comments on the 2024 Study. DOE evaluated this material in its Response to Comments on the 2024 LNG Export Study, published in the *Federal Register* on May 22, 2025.²²⁹

²²⁷ *Id.* at 22.

²²⁸ 10 C.F.R. § 590.303(g).

²²⁹ *See supra* § III.C.

DOE concluded in the Response to Comments that U.S. domestic natural gas supply is sufficient to meet domestic and market-based global demand for U.S. natural gas, including LNG, in all scenarios.²³⁰ Additionally, DOE found that increasing LNG exports results in an increase to U.S. GDP in all cases examined, including by an estimated \$410 billion cumulatively for the period 2020 through 2050 under the Reference case.²³¹ Indeed, the 2024 Study shows macroeconomic benefits to the U.S. economy across the range of scenarios analyzed.²³² DOE also concluded that higher levels of U.S. LNG exports will provide additional economic benefits through improvements to the U.S. trade balance, increased federal and state tax revenues, and increased jobs.²³³

Turning to the potential impact of LNG exports on domestic natural gas prices, Public Citizen and Environmental Intervenors allege that higher volumes of LNG exports, including Plaquemines LNG's proposed exports, will lead to large increases in domestic prices of natural gas.²³⁴ DOE found, however, that “[i]ncreased LNG exports are projected to have relatively modest impacts on prices.”²³⁵ In particular, “any domestic price impact is expected to be minimal due to the abundant supply of natural gas in the United States.”²³⁶ DOE further determined that U.S. LNG exports have not had a “consistent effect” on the price of domestic natural gas to date.²³⁷ Specifically, DOE found that the potential price impacts from increased

²³⁰ Response to Comments at 43; *see also id.* at 21.

²³¹ *See id.* at 47.

²³² *See id.*

²³³ *Id.* at 48 (stating that, although the 2024 Study does not specifically quantify the U.S. trade balance, DOE finds that an increase in the quantity of U.S. products sold abroad works to improve the balance of trade, and thus “DOE agrees that an improved trade balance would be an important benefit of greater LNG exports”); *see also id.* at 49 (stating that the 2024 Study “did not quantify job or wage revenues attributable to the construction and operation of LNG facilities,” but that DOE “postulates that LNG export facilities have a positive impact on the U.S. job market” based on quantitative information provided by several commenters).

²³⁴ *See* Public Citizen Pleading at 1-2; Enviro. Intervenors Pleading at 6-10.

²³⁵ Response to Comments at 46, 48.

²³⁶ *Id.* at 46.

²³⁷ *Id.* at 46-47.

LNG exports modeled in the 2024 Study “are within the range of prices observed over the past five years” (*i.e.*, since 2018)—and, moreover, are below the long-term price increases from U.S. LNG exports projected in DOE’s prior economic study, the 2018 LNG Export Study.²³⁸

Table 1 below shows a comparison of EIA’s projections in the *Annual Energy Outlook 2017* (AEO 2017)²³⁹ that formed the basis of the 2018 LNG Export Study and DOE’s projections in the 2024 Study.²⁴⁰ For the year 2050, the 2024 Study projects LNG exports of 56.3 Bcf/d of natural gas—more than quadruple the level projected in the 2018 LNG Export Study at 12.7 Bcf/d.²⁴¹ Over the same projection period, the 2024 Study projects an average Henry Hub natural gas price of \$4.62/MMBtu, a decrease of 28% from \$6.40/MMBtu in real dollars projected under the 2018 Study.

Additionally, we note that EIA’s most recent Short-Term Energy Outlook (STEO), issued March 10, 2026, projects Henry Hub prices averaging \$3.76/MMBtu and \$3.85/MMBtu in 2026 and 2027, respectively.²⁴² EIA also observes that a recent global supply disruption for LNG is not expected to impact domestic natural gas prices: “Although reduced liquefied natural gas (LNG) flows through the Strait of Hormuz have caused the price of natural gas in Europe and Asia to increase, we expect U.S. natural gas prices to be relatively unaffected by this development.”²⁴³

²³⁸ *Id.*

²³⁹ U.S. Energy Info. Admin., *Annual Energy Outlook 2017* (with projections to 2050) (Jan. 5, 2017), <https://www.eia.gov/outlooks/archive/aeo17/> [hereinafter AEO 2017].

²⁴⁰ 2024 Study Appendix A; *see also* 2024 Study Appendix B at B-57-59.

²⁴¹ *See* AEO 2017, Table 62 (Natural Gas Imports and Exports), https://www.eia.gov/outlooks/aeo/data/browser/#/?id=76-AEO2017®ion=0-0&cases=ref_no_cpp&start=2015&end=2050&f=A&sourcekey=0. AEO 2017 included two versions of the Reference case—one with, and one without, the implementation of a rulemaking by the U.S. Environmental Protection Agency (EPA) called the Clean Power Plan. EPA repealed the Clean Power Plan in 2019. Therefore, we refer only to the AEO 2017 Reference case without the Clean Power Plan.

²⁴² U.S. Energy Info. Admin., Short-Term Energy Outlook (Mar. 10, 2026), https://www.eia.gov/outlooks/steo/pdf/steo_full.pdf [hereinafter March 2026 STEO].

²⁴³ *Id.*

Table 1: Year 2050 Reference Case Comparisons in AEO 2017 (Basis of 2018 LNG Export Study) and 2024 LNG Export Study

	AEO 2017 Reference Case Without Clean Power Plan	2024 LNG Export Study – Defined Policies: Market Resolved Scenario
Lower-48 Dry Natural Gas Production (Bcf/d)	107.9	139.6
Total Natural Gas Consumption (Bcf/d)	92.4	80.3
Electric Power Sector Consumption (Bcf/d)	31.8	17.8
LNG Exports – Total (Bcf/d)	12.7	56.3
Henry Hub Spot Price (\$/MMBtu) ^(Note 1)	\$6.40 (2022\$)	\$4.62 (2022\$)

Note 1: Prices adjusted to 2022\$ with the AEO 2017 projection of a Gross Domestic Product price index.

For these reasons and those set forth in the Response to Comments, we find that Public Citizen’s and Environmental Intervenors’ arguments concerning price impacts are not sufficiently supported by record evidence to overcome DOE’s finding based on the 2024 Study that Plaquemines LNG’s proposed exports will generate net economic benefits to the U.S. economy and will not be inconsistent with the public interest.

2. Plaquemines LNG’s Amendment Application

Upon review, DOE finds that several factors identified in the Amendment Application support a grant of Plaquemines LNG’s request to increase its authorized non-FTA export volume.

First, Plaquemines LNG points to EIA data and projections in asserting that the United States has abundant natural gas resources available to meet both projected future domestic needs and demand for the proposed exports.²⁴⁴ We agree. In addition to the 2024 LNG Export Study, we take administrative notice of EIA’s recent authoritative projections, set forth in the *Annual Energy Outlook 2025* (AEO 2025)²⁴⁵ and the March 2026 STEO, to evaluate current and future natural gas supply, demand, and prices. Specifically, DOE has assessed AEO 2025 to evaluate any differences from AEO 2023, which formed the basis for the 2024 Study. We find that EIA’s projections in AEO 2025 continue to show market conditions that will accommodate increased exports of natural gas—well above what is required to meet projected increases in domestic consumption.

Additionally, we take note of EIA’s most recent forecast on short-term market conditions set forth in its March 2026 STEO.²⁴⁶ The STEO projects that the total domestic dry production of natural gas in the United States is expected to rise to an average of 109.5 Bcf/d and 112.3 Bcf/d in 2026 and 2027, respectively, surpassing 2025 production levels.²⁴⁷

Second, Public Citizen and Environmental Intervenors raise concerns about the “high prices” of LNG exports creating significant economic hardship for many Americans, with Environmental Intervenors arguing that these prices impact certain households (including low-income, Black, Hispanic, and Native American households) more than the average household.²⁴⁸ The D.C. Circuit, however, previously rejected an argument by Sierra Club that DOE “erred by failing to consider distributional impacts” when evaluating the public interest under NGA section

²⁴⁴ See Amendment App. at 19-21.

²⁴⁵ U.S. Energy Info. Admin., *Annual Energy Outlook 2025* (Apr. 15, 2025), <https://www.eia.gov/outlooks/aeo/> [hereinafter AEO 2025].

²⁴⁶ March 2026 STEO, Table 5.

²⁴⁷ See *id.*

²⁴⁸ See Public Citizen Pleading at 1-2; Enviro. Intervenors Pleading at 1, 9-12.

3(a).²⁴⁹ Moreover, neither Public Citizen nor Environmental Intervenors have provided an analysis of distributional consequences of authorizing LNG exports at the household level to support their concerns. Plaquemines LNG described in its Amendment Application the various public benefits that will be produced by the construction and operation of the Project to the local economy and the United States more broadly, including increased employment to support the Project,²⁵⁰ and no party contested those Project benefits.

We also emphasize a principal finding of the 2024 Study: increasing U.S. LNG exports increases U.S. GDP.²⁵¹ More specifically, we note that DOE acknowledged the concerns raised by Sierra Club and others that “low-income [] American households all face dramatically higher energy burdens.”²⁵² Indeed, the 2024 Study employed an analytical tool (the “HEIDM tool”) for the purpose of examining impacts by income class.²⁵³

DOE also found that, with respect to changes in the price of industrial inputs such as natural gas (which, under Environmental Intervenors’ view, could adversely impact U.S. industrial consumers),²⁵⁴ “the impact of any price changes on industrial inputs and thus the cost of other goods is uncertain in a dynamic economy over a period of 25 years.”²⁵⁵ DOE thus concluded that “impacts on household and industrial energy expenditures, which may be as small as the margin of error of the analysis,” are “insufficient to overcome the other economic benefits associated with increased LNG exports, including GDP, balance of trade, tax revenue, and

²⁴⁹ See *Sierra Club II*, 703 Fed. App’x at *3 (consolidated case denying three petitions for review of LNG export authorizations).

²⁵⁰ Amendment App. at 25.

²⁵¹ See Response to Comments at 46; see also *id.* at 47 (Key Conclusions).

²⁵² *Id.* at 25.

²⁵³ *Id.*

²⁵⁴ See Enviro. Intervenors Pleading at 8.

²⁵⁵ See Response to Comments at 25.

employment effects.”²⁵⁶ Accordingly, we find that the record does not support Public Citizen’s and Environmental Intervenors’ arguments.

Third, we agree with Plaquemines LNG that, over the term of the authorization, the proposed exports will improve the United States’ ties with its allies and trade partners and make a positive contribution to the United States’ economy, including the trade balance. For instance, even beyond the multi-billion dollar economic investment and jobs created from the construction of the Project, the requested increase in LNG exports (0.45 Bcf/d or 165.33 Bcf/yr) could reduce the trade deficit by up to approximately \$1.3 billion annually based on observed average U.S. LNG export prices for January through December 2025.²⁵⁷ Further, the increased value of Plaquemines LNG’s exports would spur other domestic economic activity and benefits, including the potential for supporting upstream production and related employment.

In sum, based on the 2024 Study, the most recent data in AEO 2025 and the March 2026 STEO, along with other evidence provided by Plaquemines LNG, DOE finds that the market will be capable of sustaining the level of non-FTA exports requested in the Amendment Application over the authorization term without negative economic impacts that overcome the economic benefits derived from such exports. We also find that Plaquemines LNG’s requested increase in its non-FTA export volume is consistent with U.S. policy.

C. Energy Security

An efficient, transparent international market for natural gas with diverse sources of supply provides both economic and strategic benefits to the United States and our allies. For

²⁵⁶ *Id.*

²⁵⁷ Specifically, \$7.92/Mcf * 165.33 Bcf. See U.S. Energy Info. Admin., Natural Gas Monthly, Table 5, LNG Export Prices, at 19, https://www.eia.gov/naturalgas/monthly/pdf/table_05.pdf (Feb. 2026). We note that this value could fluctuate based on U.S. LNG export prices but would still represent a significant reduction in the trade deficit. In the last 5 years, observed average U.S. LNG export prices have been as low as \$6.41/Mcf (in 2024) and as high as \$12.24/Mcf (in 2022).

example, in light of the 2022 Russian invasion of Ukraine, there continue to be concerns about energy security for Europe and Central Asia, particularly given the relative share of Russian natural gas supplied to those regions until recently,²⁵⁸ with continued risk due to the now-expired agreement for the supply of Russian natural gas to Europe.²⁵⁹

Environmental Intervenors assert that the export capacity brought online several years from now will not address the immediate energy needs of Europe.²⁶⁰ These arguments, however, are not supported by current facts. The United States has an increasingly important role in the European Union’s (EU) natural gas supply. Since 2022, following Russia’s invasion of Ukraine, the vast majority of U.S. LNG exports have been imported by countries in Europe. In 2022, for example, Europe received 69% of all LNG exports from the United States, up from 34% in 2021.²⁶¹ Similarly, from January through November 2025, “Europe received 68% of U.S.-origin exports.”²⁶² Further, the European Commission recently approved a legally binding ban on EU imports of Russian natural gas by the end of 2027, and signaled that, to replace Russian supplies, the EU “could import more U.S. LNG” among other measures.²⁶³ In EIA’s *International Energy*

²⁵⁸ According to EIA data, until immediately before Russia attacked Ukraine, natural gas imports delivered by pipeline into Europe provided most imported volumes into Europe, with imports sourced from Russia pre-2022 comprising the largest share. See U.S. Energy Info. Admin., *Today in Energy* (Feb. 11, 2022), <https://www.eia.gov/todayinenergy/detail.php?id=51258>.

²⁵⁹ Reuters reports that the five-year agreement between Moscow and Kyiv for the transit of Russian natural gas to Europe via Ukraine expired on January 1, 2025, as Kyiv refused to renew a transit agreement extending or developing a new deal. See Reuters, *Russian gas era in Europe ends as Ukraine stops transit* (Jan. 1, 2025), <https://www.reuters.com/business/energy/russia-halts-gas-exports-europe-via-ukraine-2025-01-01/>.

²⁶⁰ Amendment App. at 5.

²⁶¹ See U.S. Energy Info. Admin., *Today in Energy*, “Ten years after first Sabine Pass cargo, U.S. LNG exports are still on the rise” (Feb. 24, 2026), <https://www.eia.gov/todayinenergy/detail.php?id=67224>.

²⁶² See *id.*

²⁶³ See Reuters, *EU proposes ban on Russian gas imports by end of 2027* (June 18, 2025), [https://www.consilium.europa.eu/en/press/press-releases/2025/12/03/council-and-parliament-strike-a-deal-on-rules-to-phase-out-russian-gas-imports-for-an-energy-secure-and-independent-europe/#:~:text=The%20regulation%20introduces%20a%20legally,2026%20and%20autumn%202027%20respectively](https://www.reuters.com/sustainability/boards-policy-regulation/eu-readies-ban-russian-gas-imports-by-end-2027-2025-06-17/#:~:text=To%20replace%20Russian%20supplies%2C%20the,Spain%2C%20Belgium%2C%20the; see also Council of the European Union, “Council and Parliament strike a deal on rules to phase out Russian gas imports for an energy secure and independent Europe” (Dec. 3, 2025), <a href=).

Outlook 2023 (IEO 2023), EIA projected that “slow but increasing natural gas demand growth, coupled with the region’s decreasing natural gas production, increases Western Europe’s net natural gas imports by between 2.3 Tcf and 6.2 Tcf by 2050 across all cases.”²⁶⁴ This analysis further supports a key objective of the “EU’s energy union strategy,” as “[LNG] can contribute to diversifying gas supplies, thus improving EU energy security in the short-term.”²⁶⁵ We thus find that Plaquemines LNG’s proposed additional exports will continue to be a source of global supplies for the EU to utilize in light of its declining use of Russian natural gas.

In recent weeks, the global supply of LNG has been significantly impacted from the developments in the Middle East—including the supply disruption that occurred on March 2, 2026, from the drone strike at the Ras Laffan LNG export terminal operated by QatarEnergy,²⁶⁶ which has removed approximately 20% of global LNG supplies,²⁶⁷ and the ongoing force majeure curtailment of LNG production at QatarEnergy.²⁶⁸ The need for additional U.S. LNG supplies from operating facilities like the Plaquemines LNG Project that can be deployed immediately are essential to supplying the global LNG market.²⁶⁹

²⁶⁴ U.S. Energy Info. Admin., *International Energy Outlook 2023* (with projections to 2050), at 45 (Oct. 11, 2023), https://www.eia.gov/outlooks/ieo/pdf/IEO2023_Narrative.pdf.

²⁶⁵ Official website of the European Union (Energy, LNG), https://energy.ec.europa.eu/topics/carbon-management-and-fossil-fuels/liquefied-natural-gas_en.

²⁶⁶ See QatarEnergy, “QatarEnergy to Stop Production of LNG” (Mar. 2, 2026), <https://www.qatarenergy.qa/en/MediaCenter/Pages/newsdetails.aspx?ItemId=3892> (“Due to military attacks on QatarEnergy’s operating facilities in Ras Laffan Industrial City and Mesaieed Industrial City in the State of Qatar, QatarEnergy has ceased production of [LNG] and associated products.”).

²⁶⁷ See U.S. Energy Info. Admin., *Weekly Natural Gas Storage Report Supplement* (Mar. 5, 2026), <https://www.eia.gov/naturalgas/weekly/supplement/archive/2026/03/05/> (follow link to “Liquefied Natural Gas – International Prices”) (stating that “QatarEnergy LNG, which supplies about 20% of global LNG volumes, declared force majeure on LNG exports”).

²⁶⁸ See QatarEnergy, “QatarEnergy Declares Force Majeure” (Mar. 4, 2026), <https://www.qatarenergy.qa/en/MediaCenter/Pages/newsdetails.aspx?ItemId=3894> (stating that, due to its need to “stop production of [LNG] and associated products, QatarEnergy has declared Force Majeure to its affected buyers”).

²⁶⁹ Environmental Intervenors and the Sierra Club commenters argue that the increase in export volume requested by Plaquemines LNG will not provide any help in reducing reliance on Russian natural gas in the short term, since the Project was not yet constructed at that time (*i.e.*, in 2022). See *Enviro. Intervenors Pleading at 5*; *Sierra Club Beyond Dirty Fuels Comment at 1*. Now, however, the Project is operating, and thus we find that the requested increase in export volumes will be able to address immediate global energy needs as described above.

In sum, by authorizing increased exports of U.S.-sourced LNG to non-FTA countries, including to U.S. allies in Europe and elsewhere, this Order will enable Plaquemines LNG to help mitigate energy security concerns.²⁷⁰ More generally, to the extent U.S. exports diversify global LNG supplies and increase the volumes of destination-flexible LNG available globally, these exports will improve energy security for many U.S. allies and trading partners.²⁷¹

We further note that, like all authorizations for the export of natural gas, no export will be permitted to any country for which exports are otherwise restricted by U.S. law or policy. For these reasons, we reiterate our finding that authorizing Plaquemines LNG’s volume of exports to non-FTA countries will not be inconsistent with the public interest.

DOE also notes that, in the 2024 LNG Export Study, DOE projected continued high global demand for natural gas through 2050, demonstrating a need for additional LNG export facilities in the United States or, in this case, additional export volumes.²⁷² For example, DOE projected in its *Defined Policies: Market Resolved* scenario that U.S. natural gas production will increase 54%, up to 51.0 trillion cubic feet (Tcf) of natural gas, and LNG exports will increase to 20.5 Tcf, between 2020 and 2050.²⁷³ This level of LNG demand growth through to 2050 will require substantial investments in new natural gas and LNG projects.

Additionally, we take administrative notice of a report published in October 2024 by the Institute of Energy Economics, Japan (IEEJ), which found that “[g]lobal LNG demand in 2050 is

²⁷⁰ We note that Europe was the primary destination of U.S. LNG throughout 2024 and 2025. In December 2025, for example, almost 76% of all U.S. LNG exports went to Europe. See U.S. Dep’t of Energy, *U.S. Natural Gas Imports and Exports Monthly*, at 1 (Feb. 2026), <https://www.energy.gov/sites/default/files/2026-02/Natural%20Gas%20Imports%20and%20Exports%20Monthly%20December%202025.pdf>.

²⁷¹ As of December 2025, 17% of U.S. LNG exports have gone to FTA countries, and 83% have gone to non-FTA countries. See *id.* at 45.

²⁷² See 2024 Study Appendix A, at A-17 – A-22.

²⁷³ 2024 Study Appendix B at B-57, https://www.energy.gov/sites/default/files/2025-10/LNGUpdate_AppendixB_Dec2024.pdf; 2024 Study Appendix A at A-22, https://www.energy.gov/sites/default/files/2025-10/LNGUpdate_AppendixA_Dec2024.pdf.

projected to increase by 74% from the present level.”²⁷⁴ According to the IEEJ, “[o]ne of the focal points of increasing demand is Southeast Asia’s emerging markets, notably the power generation sector,” and “[i]f the energy efficiency improvements assumed in these scenarios are not realised, LNG demand would increase further.”²⁷⁵ Similarly, other forecasts project varying levels of global demand for LNG, with many analysts predicting moderate to significant growth in LNG demand globally.

In light of these benefits to U.S. and global energy security, we find that Plaquemines LNG’s requested increase in its non-FTA export volume will advance the public interest for reasons that are distinct from and additional to the benefits discussed above.

D. Issuance of Categorical Exclusion Under NEPA

NEPA is “a purely procedural statute.”²⁷⁶ DOE’s NEPA procedures provide for a categorical exclusion for actions that normally do not require preparation of either an EIS or an EA—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*.²⁷⁷ In establishing this revised categorical exclusion, DOE concluded that the “potential environmental effects associated with marine transport, the only reasonably foreseeable environmental impacts associated with DOE natural gas export authorizations, are minimal.”²⁷⁸

Specifically, “[b]ased on prior NEPA reviews and technical reports” summarized in DOE’s Technical Support Document, DOE “determined that transport of natural gas by marine

²⁷⁴ The Institute of Energy Economics, Japan, IEEJ 2025 Outlook (Oct. 18, 2024), <https://enken.ieej.or.jp/data/12114.pdf>.

²⁷⁵ *Id.*

²⁷⁶ *Seven Cnty.*, 605 U.S. at 173, 178, 180, 184.

²⁷⁷ See 10 C.F.R. Part 1021, Subpt. D, App. B, Categorical Exclusion B5.7. This categorical exclusion amended the prior B5.7 categorical exclusion. See NEPA Implementing Procedures Final Rule, 85 Fed. Reg. at 78,197.

²⁷⁸ NEPA Implementing Procedures Final Rule, 85 Fed. Reg. at 78,199 (emphasis added) (citing *Pub. Citizen*, 541 U.S. at 767-68).

vessel normally does not pose the potential for significant environmental impacts.”²⁷⁹ DOE also observed that LNG shipments associated with export authorizations “comprise less than one percent of vessel calls from U.S. ports annually.”²⁸⁰ Further, “[e]ven with increased LNG exports, the relative proportion of LNG shipments to total shipping is not expected to change substantially.”²⁸¹ On this basis, DOE concluded that “marine transport from DOE’s actions does not have the potential to markedly affect the global environmental impacts associated with the commercial shipping industry.”²⁸²

In this proceeding, Environmental Intervenors assert that the B5.7 categorical exclusion is “arbitrary” and “was adopted unlawfully.”²⁸³ These arguments are unfounded, as DOE properly adopted the B5.7 categorical exclusion through rulemaking, consistent with NEPA and relevant judicial authorities including *Public Citizen*.²⁸⁴

Environmental Intervenors also raise numerous environmental arguments in opposition to the Amendment Application, including that Plaquemines LNG’s proposed exports will increase natural gas production and associated air pollution (including emissions of greenhouse gases and ozone precursors), will increase the severity of climate change, and will harm wildlife.²⁸⁵

Environmental Intervenors specifically contend that the proposed exports will increase shipping traffic which allegedly could, in turn, increase air pollution and adversely impact marine life.²⁸⁶

²⁷⁹ *Id.* at 78,198 (citing DOE’s Technical Support Document, *see supra* § II.C); *see also id.* at 78,202 (stating that the Technical Support Document was focused on the potential impacts associated with transporting LNG cargo, and “includes consideration of accidents (including spills and fires), safety and security during transport, and some 50 years of experience transporting LNG on marine vessels”); *id.* (finding that “the effectiveness of [agency] regulations and industry practices over decades of LNG transport provide strong evidence that there is normally no potential for significant environmental impacts due to marine transport of LNG”).

²⁸⁰ *Id.* at 78,202.

²⁸¹ *Id.*

²⁸² *Id.*

²⁸³ Enviro. Intervenors Pleading at 12-13.

²⁸⁴ *See generally* NEPA Implementing Procedures Final Rule.

²⁸⁵ *See, e.g.*, Enviro. Intervenors Pleading at 2-5; *see also supra* § VII.C.

²⁸⁶ Enviro. Intervenors Pleading at 3.

Environmental Intervenors also assert that DOE must “take a hard look at environmental impacts occurring throughout the entire LNG lifecycle,” before it can accurately assess the foreseeable impacts from Plaquemines LNG’s proposed exports.²⁸⁷

DOE finds that marine transport effects are the only reasonably foreseeable environmental impacts from Plaquemines LNG’s proposed exports. As to Environmental Intervenors’ arguments related to shipping traffic and other alleged marine transport effects, DOE has considered these impacts in accordance with NEPA.²⁸⁸ DOE also finds that there is no legal requirement to consider any other environmental impacts raised by Environmental Intervenors.²⁸⁹ Indeed, the best reading of the statute may preclude DOE from considering environmental effects beyond DOE’s specified jurisdiction.²⁹⁰ Accordingly, on March 13, 2026, DOE issued a categorical exclusion B5.7 determination for the non-FTA portion of Plaquemines LNG’s Amendment Application.²⁹¹ DOE finds here that this action is excluded from further NEPA review obligations pursuant to that categorical exclusion.²⁹²

We acknowledge that this position is a departure from DOE’s past practice of broadly considering the potential upstream and downstream environmental effects of authorizing exports

²⁸⁷ *Id.* at 11.

²⁸⁸ See National Environmental Policy Act Implementing Procedures, 85 Fed. Reg. at 78,199.

²⁸⁹ See *supra* §§ II.C, III.A; see also, e.g., *Seven Cnty.*, 605 U.S. at 177 (emphasizing that NEPA, as a “purely procedural” statute, “does not mandate particular results, but simply prescribes the necessary process’ for an agency’s environmental review of a project”) (quoting *Robertson v. Methow Valley Citizens Council*, 490 U.S. 332, 350 (1989)); *NAACP v. Fed. Power Comm’n*, 425 U.S. 662, 669-70 (1976) (discussing the “content and meaning” of the words “public interest” in the NGA based on the statute’s “principal purpose” of encouraging “the orderly development of plentiful supplies” of natural gas at reasonable prices).

²⁹⁰ See, e.g., *NAACP*, 425 U.S. at 669-70 (expressing the statute’s “principal purpose”); *Sierra Club I*, 867 F.3d at 203 (noting the “general presumption favoring [export] authorization”); *Morrison v. Nat’l Australia Bank*, 561 U.S. 247, 255 (2010) (precluding extraterritorial application of United States law without “clearly expressed” intention of Congress).

²⁹¹ U.S. Dep’t of Energy, Categorical Exclusion Determination, Venture Global Plaquemines LNG, LLC, Docket No. 16-28-LNG (Mar. 13, 2026). DOE’s determination that the B5.7 categorical exclusion applies to the Application is entitled to “substantial deference.” *Seven Cnty.*, 605 U.S. at 180; see also *id.* at 182 (in evaluating agency decision-making under NEPA, “[c]ourts should afford substantial deference and should not micromanage those agency choices so long as they fall within a broad zone of reasonableness”).

²⁹² See 42 U.S.C. § 4336(a)(2), (b)(2).

of LNG to non-FTA countries, beyond the transportation of the LNG by marine vessel. However, this position is informed by, and consistent with, the Supreme Court’s holdings in *Public Citizen* and, most recently, *Seven County*, which make clear that “agencies are not required to analyze the effects of projects over which they do not exercise regulatory authority.”²⁹³ As relevant here, DOE’s authority under section 3 of the NGA extends only to the export of natural gas (including LNG) as a commodity,²⁹⁴ not to the end use of natural gas, over which DOE has no control.²⁹⁵ As noted, this position is also consistent with DOE’s review of its statutory authority in the B5.7 categorical exclusion rulemaking in 2020, which was expressly based on DOE’s statutory authority and the legal principle enunciated in *Public Citizen*.²⁹⁶

Assuming, *arguendo*, both that DOE has authority to consider all of the environmental effects that Environmental Intervenors assert, and that such effects are reasonably foreseeable from an authorization and require consideration by DOE, we still would determine that Plaquemines LNG’s proposed exports are consistent with the public interest Congress seeks to advance through NGA section 3(a).²⁹⁷ Weighing the findings of the Technical Support Document, the actions of other federal and state agencies to regulate, permit, and mitigate

²⁹³ *Seven Cnty.*, 605 U.S. at 189 (discussing *Pub. Citizen*, 541 U.S. at 770, and concluding that “nothing in NEPA required the Board to go further and study environmental impacts from upstream or downstream projects separate in time or place from the 88-mile railroad line’s construction and operation”).

²⁹⁴ *See, e.g., Sierra Club*, 827 F.3d at 40 (recognizing that DOE “maintains exclusive jurisdiction over the export of natural gas as a commodity”); NEPA Implementing Procedures Final Rule, 85 Fed. Reg. at 78,197-98, 78,201 (stating that “DOE’s discretionary authority under Section 3 of the NGA is limited to the authorization of exports of natural gas to non-FTA countries,” and that DOE’s review under NEPA “is limited to the marine transport effects” of such exports); *see also supra* § II.C.

²⁹⁵ *See, e.g., Sierra Club*, 134 F.4th at 575 (holding, in denying petition for review of LNG export authorization issued by DOE under NGA section 3(a), that “the impacts of downstream emissions [from U.S. LNG] in foreign countries are not reasonably foreseeable” under NEPA).

²⁹⁶ *See* NEPA Implementing Procedures Final Rule, 85 Fed. Reg. at 78,197 (discussing DOE’s limited review in considering environmental effects associated with the export of LNG to non-FTA countries under NEPA, citing *Pub. Citizen*); *id.* at 78,198-99, 78,201. *Sierra Club* is currently challenging the B5.7 categorical exclusion and its use in the ongoing Venture Global CP2 LNG, LLC proceeding. *See infra* note 345.

²⁹⁷ 15 U.S.C. § 717b(a); *see* Amendment App. at 1-2, 6.

environmental impacts such as those cited by Environmental Intervenors,²⁹⁸ and the findings of DOE’s past life cycle analyses, against the economic, energy security, and other factors favoring authorization, we would find that Plaquemines LNG’s requested non-FTA exports will advance the public interest.

E. Other Considerations

DOE notes the continuing uncertainty that all of the proposed LNG export projects will ever be realized because of the time, difficulty, and expense of commercializing, financing, and constructing LNG export terminals, as well as the uncertainties and competition inherent in the global market for LNG.²⁹⁹

More generally, DOE continues to subscribe to the principle set forth in the 1984 Policy Guidelines that, under most circumstances, the market is the most efficient means of allocating natural gas supplies.³⁰⁰ However, agency intervention may be necessary to protect the public in the event there is insufficient domestic natural gas for domestic use, or as a result of other facts or circumstances beyond those presented here.³⁰¹

F. Conclusion

Upon review of the record evidence and relevant precedent in earlier non-FTA export decisions, DOE has not found an adequate basis to conclude that Plaquemines LNG’s proposed exports of U.S. LNG to non-FTA countries will be inconsistent with the public interest. We thus

²⁹⁸ See, e.g., 42 U.S.C. § 7401 *et seq.*; 33 U.S.C. § 1901 *et seq.*; 33 U.S.C. § 1322(p); 16 U.S.C. § 1531 *et seq.*; 14 U.S.C. § 522.

²⁹⁹ See *infra* § VIII.F (identifying long-term orders vacated or expired to date); see also, e.g., *Sierra Club vs. U.S. Dep’t of Energy*, 134 F.4th 568, 574 (D.C. Cir. 2025) (discussing DOE’s findings as to “the uncertainties in the global energy markets” affecting the “supply and demand responses” for exports of U.S. LNG in the future).

³⁰⁰ 1984 Policy Guidelines, 49 Fed. Reg. at 6684.

³⁰¹ In previous orders, some commenters asked DOE to clarify the circumstances under which the agency would exercise its authority to revoke (in whole or in part) final LNG export authorizations. DOE stated that it could not precisely identify all the circumstances under which such action might be considered. Subsequently, in 2018, DOE issued a policy statement addressing this issue. See U.S. Dep’t of Energy, Policy Statement Regarding Long-Term Authorizations to Export Natural Gas to Non-Free Trade Agreement Countries, 83 Fed. Reg. 28,841 (June 21, 2018).

find that Public Citizen and Environmental Intervenors have failed to overcome the statutory presumption that the proposed export authorization is consistent with the public interest. For that reason, we are authorizing Plaquemines LNG’s proposed exports to non-FTA countries as set forth below.

This Order amends an existing non-FTA order. Therefore, with the vacatur or expiration of previous long-term non-FTA export authorizations,³⁰² there are currently 44 final non-FTA authorizations from the lower-48 states in a cumulative volume of exports totaling approximately 53.72 Bcf/d of natural gas, or approximately 19.6 trillion cubic feet per year, as follows:³⁰³

Sabine Pass Liquefaction, LLC (2.2 Bcf/d),³⁰⁴ Cameron LNG, LLC (1.7 Bcf/d),³⁰⁵ FLEX I (1.4

³⁰² To date, DOE has vacated nine long-term non-FTA authorizations (none over the objection of the authorization holder) in the following proceedings: *Eagle LNG Partners Jacksonville II LLC*, Docket No. 17-79-LNG (Mar. 12, 2023), *Bear Head Energy Inc. (formerly Bear Head LNG Corp.) and Bear Head LNG (USA), LLC*, Docket No. 15-33-LNG (Jan. 20, 2023); *Jordan Cove Energy Project L.P.*, Docket No. 12-32-LNG (Apr. 22, 2022); *Air Flow N. Am. Corp.*, Docket No. 14-206-LNG (Dec. 30, 2021); *Emera CNG, LLC*, Docket No. 13-157-CNG (Oct. 20, 2021); *Annova LNG Common Infrastructure, LLC*, Docket No. 19-34-LNG (Apr. 23, 2021); *Floridian Natural Gas Storage Co., LLC*, Docket No. 15-38-LNG (Oct. 22, 2020); *Carib Energy (USA) LLC*, Docket No. 11-141-LNG (Nov. 17, 2020); *Flint Hills Res., LP*, Docket No. 15-168-LNG (Feb. 5, 2019). Additionally, two long-term non-FTA authorizations in the following proceedings have expired: *Pieridae Energy (USA) Ltd.*, Docket No. 14-179-LNG (Jan. 17, 2025); *Magnolia LNG, LLC*, Docket No. 13-132-LNG (Dec. 8, 2023).

³⁰³ Subsequent amendments to each order, where applicable, are omitted. Any number discrepancies are due to rounding. Additionally, this cumulative volume of non-FTA exports from the lower-48 states does not include export volumes granted pursuant to DOE’s regulations for small-scale exports of natural gas. See 10 C.F.R. §§ 590.102(p), 208(a); U.S. Dep’t of Energy, Hydrocarbons and Geothermal Energy Office, Long Term Applications Received by DOE to Export Domestically Produced LNG, CNG, CGL from the Lower-48 States, at 15-16 (as of Mar. 4, 2026), <https://www.energy.gov/hgeo/articles/summary-lng-export-applications-lower-48-states> (identifying small-scale applications and status).

³⁰⁴ *Sabine Pass Liquefaction, LLC*, DOE/FE Order No. 2961-A, Docket No. 10-111-LNG, Final Opinion and Order Granting Long-Term Authorization to Export Liquefied Natural Gas from Sabine Pass LNG Terminal to Non-Free Trade Agreement Nations (Aug. 7, 2012).

³⁰⁵ *Cameron LNG, LLC*, DOE/FE Order No. 3391-A, Docket No. 11-162-LNG, Final Opinion and Order Granting Long-Term Multi-Contract Authorization to Export Liquefied Natural Gas by Vessel from the Cameron LNG Terminal in Cameron Parish, Louisiana, to Non-Free Trade Agreement Nations (Sep. 10, 2014).

Bcf/d),³⁰⁶ FLEX II (0.4 Bcf/d),³⁰⁷ Cove Point LNG, LP (0.77 Bcf/d),³⁰⁸ Cheniere Marketing, LLC and Corpus Christi Liquefaction, LLC (2.1 Bcf/d),³⁰⁹ Sabine Pass Liquefaction, LLC Expansion Project (1.38 Bcf/d),³¹⁰ American LNG Marketing LLC (0.008 Bcf/d),³¹¹ Sabine Pass Liquefaction, LLC Design Increase (0.56 Bcf/d),³¹² Cameron LNG, LLC Design Increase (0.42 Bcf/d),³¹³ Cameron LNG, LLC Expansion Project (1.41 Bcf/d),³¹⁴ Lake Charles Exports, LLC (2.0 Bcf/d),³¹⁵ Lake Charles LNG Export Company, LLC,³¹⁶ Carib Energy (USA), LLC

³⁰⁶ *Freeport LNG Expansion, L.P., et al.*, DOE/FE Order No. 3282-C, Docket No. 10-161-LNG, 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 (Nov. 14, 2014) (FLEX I Final Order).

³⁰⁷ *Freeport LNG Expansion, L.P., et al.*, DOE/FE Order No. 3357-B, Docket No. 11-161-LNG, 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 (Nov. 14, 2014) (FLEX II Final Order).

³⁰⁸ *Cove Point LNG, LP*, DOE/FE Order No. 3331-A, Docket No. 11-128-LNG, Final Opinion and Order Granting Long-Term, Multi-Contract Authorization to Export Liquefied Natural Gas by Vessel from the Cove Point LNG Terminal in Calvert County, Maryland, to Non-Free Trade Agreement Nations (May 7, 2015).

³⁰⁹ *Cheniere Mktg., LLC and Corpus Christi Liquefaction, LLC*, DOE/FE Order No. 3638, Docket No. 12-97-LNG, Final Order and Opinion 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 (May 12, 2015).

³¹⁰ *Sabine Pass Liquefaction, LLC*, DOE/FE Order No. 3669, Docket Nos. 13-30-LNG, 13-42-LNG, & 13-121-LNG, Final Opinion and Order Granting Long-Term, Multi-Contract Authorization to Export Liquefied Natural Gas by Vessel from the Sabine Pass LNG Terminal Located in Cameron Parish, Louisiana, to Non-Free Trade Agreement Nations (June 26, 2015).

³¹¹ *American LNG Mktg. LLC*, DOE/FE Order No. 3690, Docket No. 14-209-LNG, Final Opinion and Order Granting Long-Term, Multi-Contract Authorization to Export Liquefied Natural Gas in ISO Containers Loaded at the Proposed Hialeah Facility Near Medley, Florida, and Exported by Vessel to Non-Free Trade Agreement Nations (Aug. 7, 2015).

³¹² *Sabine Pass Liquefaction, LLC*, DOE/FE Order No. 3792, Docket No. 15-63-LNG, Final Opinion and Order Granting Long-Term, Multi-Contract Authorization to Export Liquefied Natural Gas by Vessel from the Sabine Pass LNG Terminal Located in Cameron Parish, Louisiana, to Non-Free Trade Agreement Nations (Mar. 11, 2016).

³¹³ *Cameron LNG, LLC*, DOE/FE Order No. 3797, Docket No. 15-67-LNG, Final Opinion and Order Granting Long-Term, Multi-Contract Authorization to Export Liquefied Natural Gas by Vessel from the Cameron Terminal Located in Cameron and Calcasieu Parishes, Louisiana, to Non-Free Trade Agreement Nations (Mar. 18, 2016).

³¹⁴ *Cameron LNG, LLC*, DOE/FE Order No. 3846, Docket No. 15-90-LNG, Opinion and Order Granting Long-Term, Multi-Contract Authorization to Export Liquefied Natural Gas by Vessel from Trains 4 and 5 of the Cameron LNG Terminal Located in Cameron and Calcasieu Parishes, Louisiana, to Non-Free Trade Agreement Nations (July 15, 2016).

³¹⁵ *Lake Charles Exports, LLC*, DOE/FE Order No. 3324-A, Docket No. 11-59-LNG, Final Opinion and Order Granting Long-Term, Multi-Contract Authorization to Export Liquefied Natural Gas by Vessel from the Lake Charles Terminal in Calcasieu Parish, Louisiana, to Non-Free Trade Agreement Nations (July 29, 2016).

³¹⁶ *Lake Charles LNG Export Co., LLC*, DOE/FE Order No. 3868, Docket No. 13-04-LNG, Opinion and Order Granting Long-Term, Multi-Contract Authorization to Export Liquefied Natural Gas by Vessel from the Lake Charles Terminal in Calcasieu Parish, Louisiana to Non-Free Trade Agreement Nations (July 29, 2016).

(0.004),³¹⁷ Southern LNG Company, L.L.C. (0.36 Bcf/d),³¹⁸ the FLEX Design Increase (0.34 Bcf/d),³¹⁹ Golden Pass LNG Terminal LLC (2.57 Bcf/d),³²⁰ Delfin LNG LLC (1.8 Bcf/d),³²¹ the Lake Charles LNG Export Company, LLC Design Increase (0.33 Bcf/d),³²² the Lake Charles Exports, LLC Design Increase,³²³ Mexico Pacific Limited LLC (1.7 Bcf/d),³²⁴ Venture Global Calcasieu Pass, LLC (1.76 Bcf/d),³²⁵ ECA Liquefaction, S. de R.L. de C.V. (Mid-Scale Project) (0.44 Bcf/d),³²⁶ Energía Costa Azul, S. de R.L. de C.V. (Large-Scale Project) (1.74 Bcf/d),³²⁷

³¹⁷ *Carib Energy (USA) LLC*, DOE/FE Order No. 3937, Docket No. 16-98-LNG, Opinion and Order Granting Long-Term, Multi-Contract Authorization to Export Liquefied Natural Gas in ISO Containers Loaded at Designated Pivotal LNG, Inc. Facilities and Exported by Vessel to Non-Free Trade Agreement Nations in Central America, South America, or the Caribbean (Nov. 28, 2016).

³¹⁸ *Southern LNG Co., L.L.C.*, DOE/FE Order No. 3956, Docket No. 12-100-LNG, Opinion and Order Granting Long-Term, Multi-Contract Authorization to Export Liquefied Natural Gas by Vessel from the Elba Island Terminal in Chatham County, Georgia, to Non-Free Trade Agreement Nations (Dec. 16, 2016).

³¹⁹ *Freeport LNG Expansion, L.P., et al.*, DOE/FE Order No. 3957, Docket No. 16-108-LNG, 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 (Dec. 19, 2016).

³²⁰ *Golden Pass LNG Terminal LLC (formerly Golden Pass Products LLC)*, DOE/FE Order No. 3978, Docket No. 12-156-LNG, Opinion and Order Granting Long-Term, Multi-Contract Authorization to Export Liquefied Natural Gas by Vessel from the Golden Pass LNG Terminal Located in Jefferson County, Texas, to Non-Free Trade Agreement Nations (Apr. 25, 2017).

³²¹ *Delfin LNG LLC*, DOE/FE Order No. 4028, Docket No. 13-147-LNG, Opinion and Order Granting Long-Term, Multi-Contract Authorization to Export Liquefied Natural Gas by Vessel from a Proposed Floating Liquefaction Project and Deepwater Port 30 Miles Offshore of Louisiana to Non-Free Trade Agreement Nations (June 1, 2017).

³²² *Lake Charles LNG Export Co., LLC*, DOE/FE Order No. 4010, Docket No. 16-109-LNG, Opinion and Order Granting Long-Term, Multi-Contract Authorization to Export Liquefied Natural Gas by Vessel from the Lake Charles Terminal in Lake Charles, Louisiana, to Free Trade Agreement and Non-Free Trade Agreement Nations (June 29, 2017).

³²³ *Lake Charles Exports, LLC*, DOE/FE Order No. 4011, Docket No. 16-110-LNG, Opinion and Order Granting Long-Term, Multi-Contract Authorization to Export Liquefied Natural Gas by Vessel from the Lake Charles Terminal in Lake Charles, Louisiana, to Free Trade Agreement and Non-Free Trade Agreement Nations (June 29, 2017).

³²⁴ *Mexico Pacific Ltd. LLC*, DOE/FE Order No. 4312, Docket No. 18-70-LNG, Opinion and Order Granting Long-Term, Multi-Contract Authorization to Export U.S.-Sourced Natural Gas by Pipeline to Mexico for Liquefaction and Re-Export in the Form of Liquefied Natural Gas to Non-Free Trade Agreement Countries (Dec. 14, 2018).

³²⁵ *Venture Global Calcasieu Pass, LLC*, DOE/FE Order No. 4346, Docket Nos. 13-69-LNG, 14-88-LNG, 15-25-LNG, Opinion and Order Granting Long-Term Authorization to Export Liquefied Natural Gas to Non-Free Trade Agreement Nations (Mar. 5, 2019).

³²⁶ *ECA Liquefaction, S. de R.L. de C.V.*, DOE/FE Order No. 4364, Docket No. 18-144-LNG, Opinion and Order Granting Long-Term Authorization to Re-Export U.S.-Sourced Natural Gas in the Form of Liquefied Natural Gas from Mexico to Non-Free Trade Agreement Countries (ECA Mid-Scale Project) (Mar. 29, 2019).

³²⁷ *Energía Costa Azul, S. de R.L. de C.V.*, DOE/FE Order No. 4365, Docket No. 18-145-LNG, Opinion and Order Granting Long-Term Authorization to Re-Export U.S.-Sourced Natural Gas in the Form of Liquefied Natural Gas from Mexico to Non-Free Trade Agreement Countries (ECA Large-Scale Project) (Mar. 29, 2019).

Port Arthur LNG, LLC (1.91 Bcf/d),³²⁸ Louisiana LNG Infrastructure LLC (formerly Driftwood LNG LLC) (3.88 Bcf/d),³²⁹ FLEX4 (0.72 Bcf/d),³³⁰ Gulf LNG Liquefaction Company, LLC (1.53 Bcf/d),³³¹ Eagle LNG Partners Jacksonville LLC (0.14 Bcf/d),³³² Venture Global Plaquemines LNG, LLC (3.85 Bcf/d),³³³ Texas LNG Brownsville LLC (0.56 Bcf/d),³³⁴ Corpus Christi Liquefaction, LLC (formerly Corpus Christi Liquefaction Stage III, LLC) (1.59 Bcf/d),³³⁵ Rio Grande LNG, LLC, Rio Grande LNG Train 4, LLC, and Rio Grande LNG Train 5, LLC (3.61 Bcf/d),³³⁶ Epsilon LNG LLC (1.083 Bcf/d),³³⁷ Cheniere Marketing, LLC and Corpus Christi Liquefaction, LLC (0.3 Bcf/d),³³⁸ Sabine Pass Liquefaction, LLC (0.42 Bcf/d),³³⁹ Vista

³²⁸ *Port Arthur LNG, LLC*, DOE/FE Order No. 4372, Docket No. 15-96-LNG, Opinion and Order Granting Long-Term Authorization to Export Liquefied Natural Gas to Non-Free Trade Agreement Nations (May 2, 2019).

³²⁹ *Louisiana LNG Infrastructure LLC (formerly Driftwood LNG LLC)*, DOE/FE Order No. 4373, Docket No. 16-144-LNG, Opinion and Order Granting Long-Term Authorization to Export Liquefied Natural Gas to Non-Free Trade Agreement Nations (May 2, 2019).

³³⁰ *Freeport LNG Expansion, L.P., et al.*, DOE/FE Order No. 4374, Docket No. 18-26-LNG, Opinion and Order Granting Long-Term Authorization to Export Liquefied Natural Gas to Non-Free Trade Agreement Nations (May 28, 2019).

³³¹ *Gulf LNG Liquefaction Co., LLC*, DOE/FE Order No. 4410, Docket No. 12-101-LNG, Opinion and Order Granting Long-Term Authorization to Export Liquefied Natural Gas to Non-Free Trade Agreement Nations (July 31, 2019).

³³² *Eagle LNG Partners Jacksonville LLC*, DOE/FE Order No. 4445, Docket No. 16-15-LNG, Opinion and Order Granting Long-Term Authorization to Export Liquefied Natural Gas to Non-Free Trade Agreement Nations (Oct. 3, 2019).

³³³ *Venture Global Plaquemines LNG, LLC*, DOE/FE Order No. 4446, Docket No. 16-28-LNG, Opinion and Order Granting Long-Term Authorization to Export Liquefied Natural Gas to Non-Free Trade Agreement Nations (Oct. 16, 2019).

³³⁴ *Texas LNG Brownsville LLC*, DOE/FE Order No. 4489, Docket No. 15-62-LNG, Opinion and Order Granting Long-Term Authorization to Export Liquefied Natural Gas to Non-Free Trade Agreement Nations (Feb. 10, 2020).

³³⁵ *Corpus Christi Liquefaction, LLC (formerly Corpus Christi Liquefaction Stage III, LLC)*, DOE/FE Order No. 4490, Docket No. 18-78-LNG, Opinion and Order Granting Long-Term Authorization to Export Liquefied Natural Gas to Non-Free Trade Agreement Nations (Feb. 10, 2020).

³³⁶ *Rio Grande LNG, LLC, et al.* DOE/FE Order No. 4492, Docket No. 15-190-LNG, Opinion and Order Granting Long-Term Authorization to Export Liquefied Natural Gas to Non-Free Trade Agreement Nations (Feb. 10, 2020).

³³⁷ *Epsilon LNG LLC*, DOE/FE Order No. 4629, Docket No. 20-31-LNG, Opinion and Order Granting Long-Term Authorization to Export Natural Gas to Mexico for Liquefaction, and to Re-Export U.S. Sourced Natural Gas in the Form of Liquefied Natural Gas from Mexico to Free Trade Agreement and Non-Free Trade Agreement Nations (Dec. 8, 2020).

³³⁸ *Cheniere Mktg., LLC and Corpus Christi Liquefaction, LLC*, DOE/FECM Order No. 4799, Docket No. 19-124-LNG, Order Granting Long-Term Authorization to Export Liquefied Natural Gas to Non-Free Trade Agreement Nations (Mar. 16, 2022).

³³⁹ *Sabine Pass Liquefaction, LLC*, DOE/FECM Order No. 4800, Docket No. 19-125-LNG, Order Granting Long Term Authorization to Export Liquefied Natural Gas to Non-Free Trade Agreement Nations (Mar. 16, 2022).

Pacifico LNG, S.A.P.I. de C.V. (Mid-Scale Project) (0.55 Bcf/d),³⁴⁰ FLEX Design Increase (0.24 Bcf/d),³⁴¹ NFE Altamira FLNG, S. de R.L. de C.V. (0.40 Bcf/d),³⁴² Port Arthur LNG Phase II, LLC (1.91 Bcf/d),³⁴³ Commonwealth LNG, LLC (1.21 Bcf/d),³⁴⁴ Venture Global CP2 LNG, LLC (3.96 Bcf/d),³⁴⁵ Corpus Christi Liquefaction, LLC, CCL Midscale 8-9, LLC, and Cheniere Marketing, LLC (0.47 Bcf/d).³⁴⁶

We note that the volumes authorized for export in the *Lake Charles Exports* and *Lake Charles LNG Export* orders are both 2.0 Bcf/d and 0.33 Bcf/d, respectively, yet are not additive to one another because the source of LNG approved under all of those orders is the Lake Charles Terminal.³⁴⁷

DOE further notes that, to date, the cumulative total of U.S. and Mexico LNG export capacity, using U.S.-sourced natural gas, that is operating or under construction across 15 mid- or large-scale export projects with a non-FTA export authorization from DOE is 35.01 Bcf/d of

³⁴⁰ *Vista Pacifico LNG, S.A.P.I. de C.V.*, DOE/FECM Order No. 4929, Docket No. 20-153-LNG, Opinion and Order Granting Long-Term Authorization to Re-Export U.S.-Sourced Natural Gas in the Form of Liquefied Natural Gas from Mexico to Non-Free Trade Agreement Nations (Dec. 20, 2022).

³⁴¹ *Freeport LNG Expansion, L.P., et al.*, DOE/FECM Order No. 4961, Docket No. 21-98-LNG, Order Granting Long-Term Authorization to Export Liquefied Natural Gas to Non-Free Trade Agreement Nations (Mar. 3, 2023).

³⁴² *NFE Altamira FLNG, S. de R.L. de C.V.*, DOE/FECM Order No. 5156, Docket No. 22-110-LNG, Order Granting Long-Term Authorization to Re-Export U.S.-Sourced Natural Gas in the Form of Liquefied Natural Gas from Mexico to Non-Free Trade Agreement Nations (Aug. 31, 2024).

³⁴³ *Port Arthur LNG Phase II, LLC*, DOE/FECM Order No. 5292, Docket No. 20-23-LNG, Order Granting Long-Term Authorization to Export Liquefied Natural Gas to Non-Free Trade Agreement Nations (May 29, 2025).

³⁴⁴ *Commonwealth LNG, LLC*, DOE/FECM Order No. 5238-A, Docket No. 19-134-LNG, Final Order Granting Long-Term Authorization to Export Liquefied Natural Gas to Non-Free Trade Agreement Nations (Aug. 29, 2025).

³⁴⁵ *Venture Global CP2 LNG, LLC*, DOE/FECM Order No. 5264-A, Docket No. 21-131-LNG, Final Order Granting Long-Term Authorization to Export Liquefied Natural Gas to Non-Free Trade Agreement Nations (Oct. 21, 2025) [hereinafter CP2 LNG Final Order]. On November 20, 2025, intervenors Sierra Club and Natural Resources Defense Council filed a Request for Rehearing of the CP2 LNG Final Order. Additionally, while that rehearing proceeding is ongoing, Sierra Club and Natural Resources Defense Council filed a petition for review of the CP2 LNG Final Order. See *Sierra Club, et al. v. U.S. Dep't of Energy*, Joint Petition for Review of Orders of the United States Department of Energy, Case No. 26-1036 (D.C. Cir. Feb. 17, 2026). Petitioners are challenging: (i) the CP2 LNG Final Order; and (ii) DOE's B5.7 categorical exclusion rulemaking discussed herein, "both as applied" in the Final Order and "on its face." *Id.* at 2-3.

³⁴⁶ *Corpus Christi Liquefaction, LLC, et al.*, DOE/HGEO Order No. 5391, Docket No. 23-46-LNG, Order Granting Long-Term Authorization to Export Liquefied Natural Gas to Non-Free Trade Agreement Nations (Feb. 26, 2026).

³⁴⁷ *Lake Charles LNG Export Co., LLC*, DOE/FE Order No. 4010, at 55; see also *Lake Charles Exports, LLC*, DOE/FE Order No. 4011, at 54.

natural gas.³⁴⁸

DOE will continue taking a measured approach in reviewing the other pending applications to export natural gas. Specifically, DOE will continue to assess the cumulative impacts of each succeeding request for export authorization on the public interest with due regard to the effect on domestic natural gas supply and demand fundamentals.

Two reasons support this approach. First, the 2024 LNG Export Study, like any study based on assumptions and economic projections, is inherently limited in its predictive accuracy. Second, the market for natural gas has experienced changes due to economic, geopolitical, technological, and regulatory developments. The market of the future very likely will not resemble the market of today. In recognition of these factors, DOE intends to monitor developments that could potentially undermine the public interest in grants of successive applications for exports of domestically produced LNG and to attach terms and conditions to LNG export authorizations to protect the public interest.

IX. FINDINGS

On the basis of the findings and conclusions set forth above, we find that it has not been shown that a grant of the requested amendment to Plaquemine LNG's non-FTA authorization will be inconsistent with the public interest. Accordingly, DOE grants the non-FTA portion of the Amendment Application, subject to the Terms and Conditions and Ordering Paragraphs set

³⁴⁸ This 35.01 Bcf/d volume representing export capacity approved to non-FTA countries currently operating or under construction is comprised of:

- (i) 34.54 Bcf/d of non-FTA volumes under construction or operating in the United States calculated by adding Columns "Under Construction Pursuant to FID" & "Operating," U.S. Dep't of Energy, Liquefied Natural Gas (LNG) Exports Snapshot (Dec. 2025), https://www.energy.gov/sites/default/files/2025-12/LNG%20Snapshot%20Dec%2031%202025_0.pdf; and
- (ii) 0.47 Bcf/d in export capacity for Corpus Christi Liquefaction, LLC, *et al.*, reaching FID on the Corpus Christi Midscale Trains 8-9 Project on June 24, 2025, https://lngir.cheniere.com/assets/_528109b7ec859156f937714ff4553540/cheniere/news/2025-06-24_Cheniere_Announces_Positive_Final_Investment_321.pdf.

forth below.

X. TERMS AND CONDITIONS

The Terms and Conditions imposed by DOE in Order No. 4446, as amended, remain in effect. As necessitated by this Order, Term and Condition H and I are amended below.

Plaquemines LNG must abide by each Term and Condition or face appropriate sanction.

H. Export Quantity

This Order grants the non-FTA portion of the Amendment Application seeking to amend the authorized export volume in Order No. 4446, such that Plaquemines LNG is authorized to export LNG to non-FTA countries in a total volume equivalent to 1,405.33 Bcf/yr of natural gas.

I. Combined FTA and Non-FTA Export Authorization Volumes

The volumes of LNG authorized for export in Plaquemines LNG's FTA authorization (DOE/FE Order No. 3866, as amended) and this Order reflect the planned liquefaction capacity of the Project, as currently approved by FERC (totaling 27.2 mtpa of LNG, or approximately 1,405.33 Bcf/yr of natural gas). Accordingly, Plaquemines LNG may not treat the FTA and non-FTA export volumes as additive to one another.

XI. ORDER

Pursuant to sections 3 and 16 of the Natural Gas Act, it is ordered that:

A. Venture Global Plaquemines LNG, LLC (Plaquemines LNG) is authorized to export domestically produced LNG by vessel from the Plaquemines LNG Project (the Project), located in Plaquemines Parish, Louisiana. The volume authorized in this Order is equivalent to 1,405.33 Bcf/yr of natural gas for a term to commence on the date of first export and to extend through December 31, 2050. Plaquemines LNG is authorized to export this LNG on its own behalf and as agent for other entities that hold title to the natural gas, pursuant to one or more contracts of

any duration.³⁴⁹

B. This LNG may be exported to any country with which the United States does not have a FTA 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 U.S. law or policy.

C. Plaquemines LNG shall ensure that all transactions authorized by this Order are permitted and lawful under U.S. laws and policies, including the rules, regulations, orders, policies, and other determinations of the Office of Foreign Assets Control of the U.S. Department of the Treasury. Failure to comply with these requirements could result in rescission of this authorization and/or other civil or criminal penalties.

D. This Order is conditioned on Plaquemines LNG's ongoing compliance with any other preventative and mitigative measures at the Project imposed by federal or state agencies.

E. (i) Plaquemines LNG shall file, or cause others to file, with the U.S. Department of Energy, Hydrocarbons and Geothermal Energy Office, Office of Strategic Resources, Office of Global Energy Security (EX-34) a non-redacted copy of all executed long-term contracts associated with the long-term export of LNG from the Project on its own behalf or as agent for other entities. The non-redacted copies must be filed within 30 days of their execution and may be filed under seal, as described in Order No. 4446.

(ii) Plaquemines LNG shall file, or cause others to file, with the Office of Global Energy Security a non-redacted copy of all executed long-term contracts associated with the long-term supply of natural gas to the Project. The non-redacted copies must be filed within 30 days of their execution and may be filed under seal, as described in Order No. 4446.

³⁴⁹ See U.S. Dep't of Energy, Including Short-Term Export Authority in Long-Term Authorizations for the Export of Natural Gas on a Non-Additive Basis, 86 Fed. Reg. 2243 (Jan. 12, 2021).

F. Plaquemines LNG is permitted to use its authorization to export LNG as agent for other LNG title-holders (Registrants), after registering those entities with DOE. Registration materials shall include an agreement by the Registrant to supply Plaquemines LNG with all information necessary to permit Plaquemines LNG to register that person or entity with DOE, including: (1) the Registrant's agreement to comply with this Order and all applicable requirements of DOE's regulations at 10 C.F.R. Part 590, including but not limited to destination restrictions; (2) the exact legal name of the Registrant, state/location of incorporation/registration, primary place of doing business, and the Registrant's ownership structure, including the ultimate parent entity if the Registrant is a subsidiary or affiliate of another entity; (3) the name, title, mailing address, e-mail address, and telephone number of a corporate officer or employee of the Registrant to whom inquiries may be directed; and (4) within 30 days of execution, a copy of any long-term contracts not previously filed with DOE, described in Ordering Paragraph E of this Order.

Any change in the registration materials—including changes in company name, contact information, length of the long-term contract, termination of the long-term contract, or other relevant modification—shall be filed with DOE within 30 days of such change(s).

G. Plaquemines LNG, or others for whom Plaquemines LNG acts as agent, shall include the following provision in any agreement or other contract for the sale or transfer of LNG exported pursuant to this Order:

Customer or purchaser acknowledges and agrees that it will resell or transfer LNG purchased hereunder for delivery only to countries identified in Ordering Paragraph B of DOE/HGEO Order No. 4446-B, issued March 13, 2026, in Docket No. 16-28-LNG, and/or to purchasers that have agreed in writing to limit their direct or indirect resale or transfer of such LNG to such countries. Customer or purchaser further commits to cause a report to be provided to Venture Global Plaquemines LNG, LLC that identifies the country (or countries) into which the LNG was actually delivered, and to

include in any resale contract for such LNG the necessary conditions to ensure that Venture Global Plaquemines LNG, LLC is made aware of all such actual destination countries.

H. Plaquemines LNG shall file with the Office of Global Energy Security, on a semi-annual basis, written reports. The reports shall be filed on or by April 1 and October 1 of each year, and shall include information on the operation of the Project and the status of any associated long-term supply and export contracts.

I. With respect to any change in control of the authorization holder, Plaquemines LNG must comply with DOE's Procedures for Change in Control Affecting Applications and Authorizations to Import or Export Natural Gas.³⁵⁰

J. Monthly Reports: With respect to the exports authorized by this Order, Plaquemines LNG shall file with the Office of Global Energy Security, within 30 days following the last day of each calendar month, a report on Form FE-746R indicating whether exports have been made. If exports have not occurred, a report of "no activity" for that month must be filed. If exports have occurred, the report must provide the information specified for each applicable activity and mode of transportation, as set forth in the Guidelines for Filing Monthly Reports. These Guidelines are available at <https://www.energy.gov/hgeo/guidelines-filing-monthly-reports>. (Approved by the Office of Management and Budget under OMB Control No. 1901-0294)

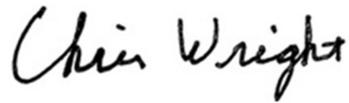
K. All monthly report filings on Form FE-746R shall be made to the Office of Global Energy Security according to the methods of submission listed on the Form FE-746R reporting instructions available at <https://www.energy.gov/hgeo/regulation>.

L. The motions to intervene submitted by Public Citizen and Sierra Club and Healthy

³⁵⁰ See 79 Fed. Reg. at 65,541-42.

Gulf (filing jointly), respectively, are deemed granted.³⁵¹

Issued in Washington, D.C., on March 13, 2026.

A handwritten signature in black ink that reads "Chris Wright". The signature is written in a cursive, slightly slanted style.

Chris Wright
U.S. Secretary of Energy

³⁵¹ 10 C.F.R. § 590.303(g).

**APPENDIX: LONG-TERM EXPORT AUTHORIZATIONS
FOR THE PLAQUEMINES LNG PROJECT**

**Table 1: Orders Issued by DOE for the Long-Term Export of LNG from the
Plaquemines LNG Project to FTA Countries**

Docket No.	Order No., With Amendments	Date Issued	Type of Amendment	Volume (Bcf/yr)
16-28-LNG	3866	July 21, 2016	-	1,240
16-28-LNG	3866-A	Oct. 21, 2020	Term extension through Dec. 31, 2050	-
16-28-LNG	3866-B	June 13, 2022	Volume increase	165.33
Total FTA Volume				1,405.33

**Table 2: Orders Issued by DOE for the Long-Term Export of LNG from the
Plaquemines LNG Project to Non-FTA Countries**

Docket No.	Order No., With Amendments	Date Issued	Type of Amendment	Volume (Bcf/yr)
16-28-LNG	4446	Oct. 16, 2019	-	1,240
16-28-LNG	4446-A	Oct. 21, 2020	Term extension through Dec. 31, 2050	-
16-28-LNG	4446-B	Mar. 13, 2026	Volume increase	165.33
Total Non-FTA Volume				1,405.33