

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

NOPETRO LNG, LLC

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DOCKET NO. 20-167-LNG

ORDER AMENDING LONG-TERM AUTHORIZATION
TO EXPORT LIQUEFIED NATURAL GAS
TO FREE TRADE AGREEMENT NATIONS
AND GIVING EFFECT TO CHANGE IN CONTROL

DOE/HGEO ORDER NO. 4671-A

MARCH 23, 2026

I. INTRODUCTION AND DESCRIPTION OF REQUEST

On March 23, 2021, the Department of Energy’s (DOE) Office of Fossil Energy (FE) (now known as the Hydrocarbons and Geothermal Energy Office)¹ issued DOE/FE Order No. 4671 (Order)² to Nopetro LNG, LLC (Nopetro) under section 3 of the Natural Gas Act (NGA).³ In this consolidated Order, DOE authorized Nopetro to export domestically produced liquefied natural gas (LNG) in a volume equivalent to 51.75 billion cubic feet per year of natural gas for a term commencing on the date of first commercial export and extending through December 31, 2050, as follows:

- (i) Under section 3(c) of the NGA,⁴ to any country with which the United States has, or in the future may enter into, a free trade agreement (FTA) requiring national treatment for trade in natural gas (FTA countries), and
- (ii) Under section 3(a) of the NGA,⁵ to any other country with which trade is not prohibited by U.S. law or policy (non-FTA countries), as qualifying “small-scale natural gas exports” under DOE’s regulations.⁶

Nopetro is authorized to export this LNG purchased from any of the 27 Facilities listed in Appendix C of its original application for export authorization (collectively, the Facilities) and transported in approved International Organization for Standardization (ISO) containers loaded

¹ 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). DOE uses the acronym in effect at the time of each order or action discussed herein.

² *Nopetro LNG, LLC*, DOE/FE Order No. 4671, Docket No. 20-167-LNG, Order Granting Long-Term Authorization To Export Liquefied Natural Gas To Free Trade Agreement Nations, and Long-Term Authorization for Small-Scale Exports of Liquefied Natural Gas (Mar. 23, 2021), <https://www.energy.gov/sites/default/files/2021-03/ord4671.pdf>.

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 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 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.

⁵ 15 U.S.C. § 717b(a).

⁶ See 10 C.F.R. §§ 590.102(p), 590.208(a); see also *Nopetro LNG, LLC*, DOE/FE Order No. 4671, at 11 (Ordering Para. A).

onto ocean-going container vessels.⁷ Under Order No. 4671, the approved FTA and small-scale export volumes are not additive.⁸ Subsequently, the non-FTA portion of the Order expired in 2023, and thus only the FTA portion of Order No. 4671 remains in effect.⁹

As relevant here, Ordering Paragraph C of the Order requires Nopetro to commence export operations to FTA countries using the Facilities “no later than five years from the date of issuance of this Order,” *i.e.*, by March 23, 2026.¹⁰ Additionally, Ordering Paragraph J states that, “[w]ith respect to any change in control of the authorization holder, Nopetro must comply with DOE/FE’s Procedures for Change in Control Affecting Applications and Authorizations to Import or Export Natural Gas.”¹¹

On February 10, 2026, Nopetro filed an application to amend Nopetro’s existing Order (Amendment Application)¹² under NGA section 3. Nopetro supplemented its Amendment Application (Supplement)¹³ on March 19, 2026.

First, Nopetro asks DOE to amend Order No. 4671 by removing, in Ordering Paragraph C, the existing five-year commencement deadline for its FTA authorization.¹⁴ Nopetro provides several reasons to support this request—namely, that this amended export term would be

⁷ See *Nopetro LNG, LLC*, DOE/FE Order No. 4671, at 4-5 (describing purchase and transport of LNG), 11 (Ordering Para. A).

⁸ See *id.* (Term & Condition H).

⁹ See U.S. Dep’t of Energy, Administrative Notice of Expiration of Small-Scale Authorization, *Nopetro LNG, LLC*, Docket No. 20-167-LNG (Apr. 18, 2023).

¹⁰ *Id.* at 12 (Ordering Para. C).

¹¹ *Id.* at 14 (Ordering Para. J) (citing 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, 65,542 (Nov. 5, 2014) [hereinafter DOE Change in Control Procedures]); see also *id.* at 8-9 & n.33 (Term & Condition D) (same).

¹² *Nopetro LNG, LLC*, Application to Amend Long-Term Authorization for Exports of Liquefied Natural Gas, Docket No. 20-167-LNG (Feb. 10, 2026), <https://www.energy.gov/sites/default/files/2026-02/Nopetro%20LNG%20LLC%20Application%20to%20Amend%20LNG%20Export%20Authorization.pdf> [hereinafter Amendment App.].

¹³ *Nopetro LNG, LLC*, Supplement to Application to Amend Long-Term Authorization for Exports of Liquefied Natural Gas, Docket No. 20-167-LNG (Mar. 19, 2026), <https://www.energy.gov/sites/default/files/2026-03/Nopetro%20Supplement%20to%20Application%20to%20Amend%20LNG%20FTA%20Export%20Authority.pdf> [hereinafter Supp.].

¹⁴ Amendment App. at 1 & n.2, 4; see also Supp. at 2 (asking DOE to eliminate “the requirement in Ordering Paragraph C that ‘For the FTA Authorization, Nopetro must commence export operations using the Facilities no later than five years from the date of issuance of this Order.’”).

“consistent with recent DOE/HGEO practice,” in which FTA orders “do not include a deadline by which such exports must begin but rather the term commences on the date of first export and ends on December 31, 2050.”¹⁵

Second, in the Amendment Application, Nopetro provides an update to its ownership information summarized in Order No. 4671.¹⁶ In the Supplement, Nopetro asks DOE to treat Nopetro’s Amendment Application as notice of a change in control, pursuant to DOE’s Change in Control Procedures (cited *supra* note 11), and to “give that notice immediate effect.”¹⁷

In this Order, DOE grants the requested amendment to Nopetro’s FTA export term in DOE/FE Order No. 4671, pursuant to NGA section 3(c). Specifically, DOE is removing the existing ordering language requiring Nopetro to commence exports to FTA countries “no later than five years from the date of issuance of [Order No. 4671].”¹⁸ DOE also gives immediate effect to the change in control for Nopetro’s FTA authorization in Order No. 4671.

II. DESCRIPTION OF CHANGE IN CORPORATE OWNERSHIP

Nopetro states that it continues to be a Florida limited liability company with its principal place of business in Miami, Florida.¹⁹ However, Nopetro states that it is now a wholly-owned subsidiary of Nopetro Energy Holdings, LLC (Nopetro Energy Holdings), a Delaware limited liability company.²⁰ According to Nopetro, Nopetro Energy Holdings is managed by a four-seat

¹⁵ Amendment App. at 4 & n.6 (citing DOE orders issued in July and November 2025); *see also id.* at 5. In the Supplement, Nopetro also clarifies that “it is not seeking revision of Ordering Paragraph A of the Order,” and thus “accepts . . . that the Authorization ‘will commence on the date of first commercial export and extend through December 31, 2050.’”) Supp. at 2.

¹⁶ *See* Amendment App. at 2 (updating applicant information summarized in *Nopetro LNG, LLC*, DOE/FE Order No. 4671, at 4).

¹⁷ Supp. at 2.

¹⁸ *Nopetro LNG, LLC*, DOE/FE Order No. 4671, at 12 (Ordering Para. C).

¹⁹ Supp. at 2; *Nopetro LNG, LLC*, DOE/FE Order No. 4671, at 4.

²⁰ *See* Amendment App. at 2; *see also* Supp. at 2-3. Nopetro states that Nopetro Energy Holdings, LLC was formerly known as Nopetro CH4 Holdings, LLC. In 2023, Nopetro-CH4 Holdings was converted to a Delaware limited liability company and its name was changed to Nopetro Energy Holdings, LLC. *See* Amendment App. at 2 n.3 and Supp. at 3 n.4

board, consisting of Jorge Herrera (two seats), Jay Demetree (one seat), and Chris Beall (one seat).²¹ Nopetro Energy Holdings is majority owned by Nopetro LLC, a Florida limited liability company, which holds 59.79% of the membership interests.

Nopetro states that Nopetro LLC is managed by Jorge Herrera as sole manager and is primarily owned by Jorge Herrera (40.28%) and the William and Barbara Locke Joint Revocable Trust (40.28%).²² Nopetro further states that a “substantial minority share of the membership interests” in Nopetro Energy Holdings (30.99%) is owned by DNP Investments, LLC, a Florida limited liability company, which in turn is majority owned by Jay Demetree.²³ The remaining membership interests in Nopetro Energy Holdings are owned by the following Delaware limited partnerships and Delaware limited liability company: NOVA Infrastructure Fund I, L.P. (6.21%); NOVA-Nopetro Splitter, L.P. (2.30%); and NOVA-Nopetro Holdco, LLC (.71%).²⁴

Nopetro acknowledges, and we find, that this change in its upstream ownership constitutes a change in control under DOE’s Change in Control Procedures.²⁵ These Procedures provide that, upon receipt of a statement of change in control relating to an existing FTA authorization, DOE will give immediate effect to the change in control and will take no further action.²⁶

III. FINDINGS FOR AMENDMENT

Section 3(c) of the NGA was amended by section 201 of the Energy Policy Act of 1992 (Pub. L. 102-486) to require that applications requesting authority for (a) the import and export of natural gas, including LNG, from and to a nation with which there is in effect a FTA requiring

²¹ Supp. at 3 (stating that all are U.S. citizens).

²² *Id.*

²³ *Id.*

²⁴ *Id.* at 3 n.5.

²⁵ *Id.* at 2.

²⁶ DOE Change in Control Procedures, 79 Fed. Reg. at 65,542; *see infra* at 6 (Ordering Para. A).

national treatment for trade in natural gas, and/or (b) the import of LNG from other international sources, be deemed consistent with the public interest and granted without modification or delay. The Amendment Application falls within section 3(c) of the NGA,²⁷ and therefore, DOE grants the requested amendment without modification or delay.²⁸

ORDER

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

- A. Nopetro's change in control has taken effect for DOE/FE Order No. 4671.
- B. In DOE/FE Order No. 4671, the first sentence of Ordering Paragraph C, pertaining to Nopetro's FTA authorization, is struck in its entirety.²⁹
- C. All other obligations, rights, and responsibilities established by Order No. 4671 remain in effect.

Issued in Washington, D.C., on March 23, 2026.

Amy Sweeney
Director, Office of Global Energy Security
Office of Strategic Resources

²⁷ 15 U.S.C. § 717b(c).

²⁸ DOE further finds that the requirement for public notice of applications and other hearing-type procedures in 10 C.F.R. Part 590, applies only to applications seeking to export natural gas, including LNG, to countries with which the United States has no FTA requiring national treatment for trade in natural gas.

²⁹ Because Nopetro's non-FTA authorization has expired, *see supra* at 3 & n.9, there is no requirement left in Ordering Paragraph C of Order No. 4671 following this amendment.