

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

CAMERON LNG, LLC

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)
DOCKET NO. 15-90-LNG

ORDER AMENDING AND PARTIALLY VACATING
LONG-TERM AUTHORIZATION
TO EXPORT LIQUEFIED NATURAL GAS
TO NON-FREE TRADE AGREEMENT COUNTRIES

DOE/HGEO ORDER NO. 3846-C

APRIL 30, 2026

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I. INTRODUCTION AND BACKGROUND

On July 15, 2016, the Department of Energy’s (DOE) Office of Fossil Energy (now the Hydrocarbons and Geothermal Energy Office)¹ issued DOE/FE Order No. 3846 (Order)² to Cameron LNG, LLC (Cameron LNG) under section 3(a) of the Natural Gas Act (NGA).³ Under Order No. 3846, Cameron LNG is authorized to export domestically produced liquefied natural gas (LNG) in a volume equivalent to 515 billion cubic feet (Bcf) per year (Bcf/yr) of natural gas from the proposed Trains 4 and 5 (Expansion Project) at the Cameron LNG Terminal,⁴ located in Cameron and Calcasieu Parishes, Louisiana, to any country with which the United States has not entered into a free trade agreement (FTA) requiring national treatment for trade in natural gas and with which trade is not prohibited by U.S. law or policy (non-FTA countries).⁵ Under amendments to the Order, Cameron LNG is authorized to export this LNG for a term beginning “when Cameron LNG commences commercial export of domestically sourced LNG from the

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 *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 in Cameron and Calcasieu Parishes, Louisiana, to Non-Free Trade Agreement Nations (July 15, 2016), *amended by* DOE/FE Order No. 3846-A (Nov. 2, 2020) (extending export commencement deadline), *further amended by* DOE/FE Order No. 3846-B (Dec. 30, 2020) (extending export term).

³ 15 U.S.C. § 717b(a). 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 *See Cameron LNG, LLC*, Application for Commencement Extension, Term Extension, and Partial Vacatur, Docket Nos. 15-36-LNG & 15-90-LNG, at 3 (Oct. 23, 2025) [hereinafter Amendment App.]. The Expansion Project provides “additional natural gas processing, storage, and liquefaction capability at the site of the existing Cameron LNG Terminal, which includes Trains 1-3 and which is currently under commercial operation.” *Id.* at 2.

⁵ *See Cameron LNG, LLC*, DOE/FE Order No. 3846, at 132-33 (Ordering Paras. A, E, F). 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.

Cameron Terminal, and . . . extend[ing] through December 31, 2050.”⁶ Further, Cameron LNG “must commence commercial export operations . . . no later than May 5, 2026.”⁷

On October 23, 2025, Cameron LNG filed a consolidated “Application for Commencement Extension, Term Extension, and Partial Vacatur” (Amendment Application)⁸ under NGA section 3.⁹ In the portion of the Amendment Application that applies to Order No. 3846, as amended,¹⁰ Cameron LNG asks DOE to amend the Order as follows:

- (1) To extend Cameron LNG’s existing deadline to commence non-FTA exports from May 5, 2026, to March 16, 2033;¹¹
- (2) To vacate 165 Bcf/yr of the 515 Bcf/yr authorized export volume, so that Cameron LNG is authorized to export LNG in a volume equivalent to 350 Bcf/yr of natural gas from the Expansion Project to non-FTA countries;¹² and
- (3) To amend the export term to extend through “the later of twenty years after the date of first commercial export or December 31, 2050, with an additional three-year make-up period.”¹³

FERC Amendment Order. In support of the Amendment Application, Cameron LNG states that, in 2022, it sought approval to amend its existing authorization to site, construct, and operate the Expansion Project, which FERC had issued in 2016.¹⁴ Specifically, Cameron LNG

⁶ *Cameron LNG, LLC*, DOE/FE Order No. 3846-B, at 16 (Ordering Para. G).

⁷ *Cameron LNG, LLC*, DOE/FE Order No. 3846-A, at 7 (Ordering Para. B).

⁸ See Amendment App., *supra* note 4.

⁹ 15 U.S.C. § 717b.

¹⁰ In DOE/FE Order No. 3680, as amended (Docket No. 15-36-LNG), Cameron LNG holds a long-term authorization to export LNG in the same volume (515 Bcf/yr), on a non-additive basis, from the Expansion Project to any FTA country under NGA section 3(c), 15 U.S.C. § 717b(c). See *Cameron LNG, LLC*, DOE/FE Order No. 3680, Docket No. 15-36-LNG, Order Granting Long-Term, Multi-Contract Authorization to Export Liquefied Natural Gas by Vessel from the Cameron LNG Terminal in Cameron and Calcasieu Parishes, Louisiana, to Free Trade Agreement Nations (July 10, 2015), *amended by* DOE/FE Order No. 3680-A (Nov. 2, 2020) (amending start date of export term), *further amended by* DOE/FE Order No. 3680-B (Dec. 30, 2020) (extending export term). Concurrently with this Order, DOE is issuing Order No. 3680-C, which addresses the portion of the Amendment Application that applies to Cameron LNG’s FTA authorization.

¹¹ Amendment App. at 1.

¹² *Id.* at 2, 14.

¹³ *Id.* at 1.

¹⁴ *Id.* at 4 & n.12 (citing *Cameron LNG, LLC*, Abbreviated Application of Cameron LNG, LLC to Amend Authorization under Section 3 of the Natural Gas Act, FERC Docket No. CP22-41-000 (Jan. 18, 2022)). For additional background on Cameron LNG’s FERC and DOE proceedings, see Amendment App. at 2-6.

proposed to make “several final design enhancements to increase the efficiency, reliability, and capacity of Train 4” and to “eliminate Train 5 and the fifth LNG storage tank.”¹⁵ Cameron LNG states that, “[w]ith the removal of Train 5, the overall maximum production capacity of the Expansion Project would decrease from 9.97 million metric tons per annum (mtpa) (equivalent to 515 Bcf/yr of natural gas) to 6.75 mtpa of LNG (equivalent to 350 Bcf/yr of natural gas), sourced exclusively from Train 4.”¹⁶

Cameron LNG states that, on March 16, 2023, FERC issued an order (FERC Amendment Order)¹⁷ that: (i) granted Cameron LNG’s request to modify the Expansion Project, finding that “the Amended Expansion Project . . . is not inconsistent with the public interest” under NGA section 3;¹⁸ (ii) granted Cameron LNG’s request to vacate the authorization to site, construct, and operate Train 5 and the fifth LNG storage tank;¹⁹ and (iii) extended the FERC deadline for the Amended Expansion Project to be constructed and made available for service from May 5, 2020, to “five years of the date of this order [*i.e.*, March 16, 2028].”²⁰

FERC 2025 Extension Order. Cameron LNG further states that, on October 21, 2025, it filed a request with FERC seeking to extend its then-existing construction and in-service deadline for the Amended Expansion Project from March 16, 2028, to March 16, 2033.²¹ On

¹⁵ *Id.* at 4-5.

¹⁶ *Id.* at 5.

¹⁷ *Cameron LNG, LLC*, Order Amending Authorization under Section 3 of the Natural Gas Act, FERC Docket No. CP22-41-000, 182 FERC ¶ 61,173 (2023) [hereinafter FERC Amendment Order], *cited in* Amendment App. at 5 & n.16.

¹⁸ *Id.* at P 59 and Ordering Para. (A); *see also id.* at P 4 (describing “design enhancements to reduce greenhouse gas (GHG) emissions and increase the overall reliability and capacity of Train 4”); Amendment App. at 5.

¹⁹ FERC Amendment Order at P 59 and Ordering Para. (C); *see also id.* at P 5 (stating that the “resultant total output of the Cameron LNG terminal would be reduced from 24.92 MTPA (in service Trains 1-3 and approved but unconstructed Train 4 and 5) to 21.7 MTPA (in service Trains 1-3 and enhanced Train 4).”

²⁰ *Id.* at Ordering Para. (B). *See also* Amendment App. at 5. Although FERC refers to Cameron LNG’s enhanced Train 4 (without Train 5) as the “Amended Expansion Project,” we continue to refer to the “Expansion Project” for consistency across DOE authorizations.

²¹ Amendment App. at 6 & n.18 (citing *Cameron LNG, LLC*, Request for Extension of Time, FERC Docket No. CP22-41-001 (Oct. 21, 2025)).

November 24, 2025, FERC issued an order (FERC 2025 Extension Order)²² granting this request, such that Cameron LNG now has “until and including March 16, 2033 to complete construction of its Amended Expansion Project facilities and make them available for service.”²³ In reaching this decision based on “the facts presented in the request and the case record,” FERC observed that “Cameron LNG has demonstrated its continued commitment to the project and made a good faith [effort] to meet its in-service deadline.”²⁴

Current Proceeding. On November 18, 2025, DOE published a notice of the non-FTA portion of the Amendment Application (Notice) in the *Federal Register*.²⁵ DOE invited the public to submit protests, motions to intervene, notices of intervention, and written comments in response to the Notice by December 18, 2025.²⁶ DOE received one comment, submitted by Shea Centore, opposing Cameron LNG’s requested extension to its export commencement deadline and/or export term, as discussed below.²⁷ DOE did not receive any protests or motions to intervene in opposition to the Amendment Application, and therefore the Amendment Application is uncontested.²⁸

Upon review of the record, DOE finds that Cameron LNG has shown good cause for its requested amendments to Order No. 3846 (as previously amended), in part, as follows:

- (i) DOE is granting the requested extension of Cameron LNG’s export commencement deadline of May 5, 2026, established in Order No. 3846-A, such that

²² *Cameron LNG, LLC*, Letter Order Granting the 10/21/2025 Request for an Extension of Time, FERC Docket No. CP22-41-001 (Nov. 24, 2025) [hereinafter FERC 2025 Ext. Order].

²³ *Id.* at 2.

²⁴ *Id.*

²⁵ U.S. Dep’t of Energy, Cameron LNG, LLC; Application for Commencement Extension, Term Extension, and Partial Vacatur, 90 Fed. Reg. 51,722 (Nov. 18, 2025).

²⁶ *See id.* at 51,723. 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).

²⁷ *See* Comment of Shea Centore, Docket No. 15-90-LNG (Dec. 18, 2025), <https://www.energy.gov/sites/default/files/2025-12/Cameron%20LNG%2C%20LLC.pdf>.

²⁸ *See* 10 C.F.R. § 590.102(b).

Cameron LNG now has until March 16, 2033, to commence non-FTA exports from the Expansion Project, consistent with the FERC 2025 Extension Order;

(ii) DOE is granting the requested partial vacatur of Cameron LNG’s authorized non-FTA export volume associated with the proposed Train 5 at the Expansion Project (165 Bcf/yr of natural gas), consistent with the FERC Amendment Order; and

(iii) DOE is granting in part Cameron LNG’s requested amendment to extend its non-FTA export term “to the later of twenty years after the date of first commercial export or December 31, 2050, with an additional three-year make-up period.”²⁹ Specifically, consistent with DOE’s longstanding practice under the 2050 Policy Statement³⁰ and DOE’s recent non-FTA orders issued to Port Arthur LNG Phase II, LLC (PALNG Phase II) in May and June 2025, respectively, DOE is maintaining Cameron LNG’s existing export term through December 31, 2050,³¹ and is granting the requested three-year Make-Up Period.³²

Thus, Cameron LNG now has three additional years to export the approved volume of LNG under Order No. 3846, as amended herein (350 Bcf/yr of natural gas), beyond its existing export term ending on December 31, 2050, solely to export any approved volume of LNG that it is unable to export during the original export term (the Make-Up Volume). The

²⁹ See Amendment App. at 1.

³⁰ 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].

³¹ Amendment App. at 1 (emphasis added); see *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, at 62 (May 29, 2025), <https://www.energy.gov/sites/default/files/2025-05/ord5292.pdf> (declining, in Term and Condition A, to establish a non-FTA export term ending “on the later of the date that is twenty years from the date of the commencement of the term or December 31, 2050,” and instead authorizing exports through “the standard non-FTA export term ending on December 31, 2050”).

³² See *Port Arthur LNG Phase II, LLC*, DOE/FECM Order No. 5292-A, Docket No. 20-23-LNG, Order Amending Long-Term Authorization to Export Liquefied Natural Gas to Non-Free Trade Agreement Nations, at 3-5 (June 30, 2025), <https://www.energy.gov/sites/default/files/2025-06/ord5292-A.pdf> (concluding that it is reasonable for DOE “to reinstate a three-year Make-Up Period, through December 31, 2053,” and amending PALNG Phase II’s non-FTA order to include the Make-Up Period).

three-year term during which the Make-Up Volume may be exported, known as the Make-Up Period, will extend through December 31, 2053, as reflected in the amendment below.³³

Categorical Exclusion. DOE’s procedures for the National Environmental Policy Act of 1969 (NEPA)³⁴ provide for a categorical exclusion if neither an environmental assessment nor an environmental impact statement is required—specifically, categorical exclusion B5.7, *Export of natural gas and associated transportation by marine vessel*.³⁵ On April 30, 2026, DOE issued a categorical exclusion determination for the amendments to Cameron LNG’s non-FTA authorization (Order No. 3846, as amended) under this provision.³⁶

II. STANDARD OF REVIEW

NGA section 3(a) authorizes the exportation of natural gas from the United States to non-FTA countries unless, after opportunity for hearing, DOE “finds that the proposed exportation . . . will not be consistent with the public interest.”³⁷ DOE also “may from time to time, after opportunity for hearing, and for good cause shown, make such supplemental order in the premises as it may find necessary or appropriate.”³⁸ Additionally, under NGA section 16, DOE may “prescribe, issue, make, amend, and rescind such orders . . . as it may find necessary or appropriate to carry out the provisions of this chapter.”³⁹ Before reaching a final decision on

³³ See, e.g., *Louisiana LNG Infrastructure, LLC*, DOE/FECM Order No. 4373-C, Docket No. 16-144-LNG, Order Amending Long-Term Authorization to Export Liquefied Natural Gas to Non-Free Trade Agreement Countries, at 13 (Dec. 16, 2025) (Term and Condition A). Cameron LNG is not permitted to increase its annual non-FTA export volume under this Order over the three-year Make-Up Period, absent appropriate authorization by DOE. See *infra* at 18 (Ordering Para. A).

³⁴ 42 U.S.C. § 4321 *et seq.*

³⁵ See 10 C.F.R. Part 1021, Subpt. D, App. B, Categorical Exclusion B5.7.

³⁶ U.S. Dep’t of Energy, Categorical Exclusion Determination, Cameron LNG, LLC, Docket No. 15-90-LNG (Apr. 30, 2026).

³⁷ 15 U.S.C. § 717b(a).

³⁸ *Id.*

³⁹ *Id.* § 717o; see also, e.g., *Appalachian Voices v. Fed. Energy Regul. Comm’n*, 139 F.4th 903 (D.C. Cir. 2025) (holding that FERC reasonably concluded that good cause existed to extend deadline to construct natural gas pipeline facilities and denying petition for review, citing NGA § 16 and FERC regulations).

an application, DOE must also comply with NEPA.⁴⁰

III. DESCRIPTION OF REQUEST

Cameron LNG's requested amendments in its non-FTA authorization, Order No. 3846, as amended, are summarized below.

A. Extension of Export Commencement Deadline

Cameron LNG asks DOE to extend the existing commencement deadline for non-FTA exports from the Expansion Project from May 5, 2026, to March 16, 2033, stating that “good cause exists to grant this request.”⁴¹

Cameron LNG asserts that, in the time since DOE issued Order No. 3846 (as well as its FTA authorization, Order No. 3680), it “has proceeded diligently to advance the Expansion Project.”⁴² According to Cameron LNG, its need for the requested extension arose primarily out of its customers' request for a redesign of the Expansion Project, and specifically modifications “to enhance the efficiency and reliability” of Train 4.⁴³ Cameron LNG further notes that the requested extension is consistent with Cameron LNG's request to FERC in October 2025 for an extension of the construction and in-service date of the Expansion Project (Train 4), which FERC granted in the FERC 2025 Extension Order.⁴⁴

Next, Cameron LNG states that it has commenced construction activities for the revised Expansion Project.⁴⁵ Cameron LNG states that, to date, it has spent “approximately \$100 million in costs” for the Expansion Project, which “include development activities such as permitting, corporate structuring, negotiation of commercial agreements necessary for the

⁴⁰ See *Sierra Club v. U.S. Dep't of Energy*, 867 F.3d 189, 192 (D.C. Cir. 2017).

⁴¹ Amendment App. at 8; see also *id.* at 1, 11.

⁴² *Id.* at 8.

⁴³ *Id.* (stating that “[t]he modifications to the design of Train 4 approved by FERC are consistent with this objective.”).

⁴⁴ *Id.* at 6.

⁴⁵ *Id.* at 8.

Expansion Project, and financing.”⁴⁶ Cameron LNG states that it has conducted front-end engineering and design, as well as “value engineering work to progress procurement of long lead items . . . and to advance service requisition for site preparation activities.”⁴⁷

Cameron LNG adds that it “has taken important commercial steps in furtherance of the project.”⁴⁸ Specifically, Cameron LNG states that it has “significantly progressed . . . amendments to the existing Liquefaction and Regasification Tolling Agreements (LRTAs)” for Trains 1-3 of the Cameron LNG Terminal, as well as “Liquefaction Tolling Agreements (LTAs) for Train 4 that would allow integrated operations of the Cameron LNG Terminal.”⁴⁹ According to Cameron LNG, these LTAs represent 350 Bcf/yr of natural gas, or 100% of the amended Expansion Project’s capacity.⁵⁰

Cameron LNG further asserts that, with the issuance of the FERC Amendment Order, it “has obtained all necessary federal, state, and local permits for the construction of the amended Expansion Project including receipt of the Louisiana Department of Environmental [Quality] (LDEQ) modified air permit.”⁵¹ Cameron LNG states that it will continue taking steps to ensure that all such permits remain in full force and effect through the requested commencement deadline.⁵² Noting that it commenced commercial operations for the Cameron LNG Terminal in 2019, Cameron LNG maintains that it “will bring its experience and proven track record to bear in diligently achieving commercial operation for the redesigned Expansion Project.”⁵³

⁴⁶ Amendment App. at 8.

⁴⁷ *Id.* at 8-9.

⁴⁸ *Id.* at 9.

⁴⁹ *Id.*

⁵⁰ *Id.*

⁵¹ *Id.*

⁵² Amendment App. at 9.

⁵³ *Id.*

Next, Cameron LNG explains that, despite its significant progress, it encountered “unforeseen delays” in developing the Expansion Project to date. Cameron LNG first points to circumstances surrounding its joint-venture owners that delayed the Expansion Project, which Cameron LNG discussed in its request for a commencement extension in March 2020.⁵⁴ Cameron LNG asserts that it “had no control over these circumstances” and “incorporates by reference [its] March 2020 Request.”⁵⁵

Additionally, according to Cameron LNG, its inability to meet its current export commencement deadline “is due in significant measure to the regulatory process for seeking and obtaining FERC approval for the redesign of the Expansion Project.”⁵⁶ Cameron LNG states that it had “little control over” the completion of FERC’s regulatory process, despite its “proactive measures” to shorten the process.⁵⁷

Finally, Cameron LNG asserts that granting the requested extension will not disturb DOE’s underlying public interest determinations for Order No. 3846 and its amendments, as the requested extension involves only “the additional time period to commence operations.”⁵⁸ Cameron LNG further asserts that “the project’s lenders require assurances that Cameron LNG has all necessary authorizations for the Expansion Project as amended,” and thus “a grant of the extension . . . is a prerequisite to reaching a positive final investment decision, to amending the LRTAs, and ultimately to successfully commercializing the Expansion Project.”⁵⁹ Cameron LNG cautions that, on the other hand, “denying the requested extension may unintentionally dissuade efforts by project developers, such as Cameron LNG, to proactively and voluntarily

⁵⁴ *Id.*; see also *Cameron LNG, LLC*, DOE/FE Order No. 3846-A, at 4-5.

⁵⁵ Amendment App. at 9-10.

⁵⁶ *Id.* at 10.

⁵⁷ *Id.*

⁵⁸ *Id.* Cameron LNG also attaches an “Updated Economic Analysis – ICF Report” as Appendix C to the Amendment Application, which it states that it previously filed with FERC. See *id.* at 10-11.

⁵⁹ *Id.* at 12.

enhance their previously approved projects to align with its customers’ evolving efficiency and environmental goals.”⁶⁰

B. Partial Vacatur of Export Volume

Cameron LNG asks DOE to vacate 165 Bcf/yr of the 515 Bcf/yr of natural gas authorized for export as LNG to non-FTA countries under Order No. 3846. Cameron LNG states that, under the FERC Amendment Order, the certificated capacity of the Expansion Project is now 350 Bcf/yr of natural gas, and therefore “[i]t is no longer necessary under the revised Expansion Project to export the full 515 Bcf/yr of natural gas authorized [by DOE].”⁶¹ Cameron LNG states that it “plans to export LNG up to a volume equivalent to the proposed production capacity of the amended Expansion Project facilities (*i.e.*, 350 Bcf/yr).”⁶²

C. Amendment to Export Term and Addition of Make-Up Period

Cameron LNG notes that, on December 30, 2020, in Order No. 3846-B, DOE granted Cameron LNG’s request to extend its non-FTA export term through December 31, 2050, pursuant to DOE’s 2050 Policy Statement.⁶³ In the Amendment Application, Cameron LNG asks DOE to extend the non-FTA export term from the current end date of December 31, 2050, “to the later of twenty years after the date of first commercial export or December 31, 2050, with an additional three-year make-up period.”⁶⁴

In support of this amendment, Cameron LNG states that, if DOE grants the requested commencement extension through March 16, 2033 (as discussed above), “it is likely that a term ending on December 31, 2050, would be less than 20 years, which is the industry standard for the long-term LNG sale and purchase agreements that support the financing of LNG export

⁶⁰ *Id.* at 11.

⁶¹ Amendment App.at 14.

⁶² *Id.*

⁶³ *See id.* at 12-13; *see also supra* note 30 (2050 Policy Statement).

⁶⁴ Amendment App. at 1; *see also id.* at 13.

terminals.”⁶⁵ Cameron LNG further asserts that, in proposing the 2050 Policy Statement in 2020, DOE “recognized that a 30-year export term would better match the operational life of LNG export facilities, would enhance authorization holders’ ability to finance their facilities, and would facilitate authorization holders’ ability to enter into longer-term natural gas supply and export contracts.”⁶⁶

Additionally, Cameron LNG states that DOE cited its prior LNG export studies through 2018 in the 2050 Policy Statement as projecting ““consistently positive economic benefits from increased levels of U.S. LNG exports as measured by GDP [Gross Domestic Product].””⁶⁷

Cameron LNG maintains that DOE’s most recent study, the 2024 LNG Export Study, “continues to show a range of persistent positive economic and security benefits from increased levels of LNG exports.”⁶⁸ For these reasons, Cameron LNG argues that it is “not inconsistent with the public interest to grant the term extension for a minimum of 20 years with a three-year make-up period.”⁶⁹

IV. DISCUSSION AND CONCLUSIONS

A. Requested Amendments

As a preliminary matter, we note that the Amendment Application is uncontested under DOE’s regulations.⁷⁰ However, the comment from Shea Centore states that they “do not support extending this,”⁷¹ which could be construed as expressing generalized opposition to the

⁶⁵ *Id.* at 12.

⁶⁶ *Id.* at 13 (emphasis in original).

⁶⁷ *Id.* (quoting 2050 Policy Statement, 85 Fed. Reg. at 52,241).

⁶⁸ *Id.* (citing U.S. Dep’t of Energy, Office of Fossil Energy & Carbon Management, Energy, Economic, and Environmental Assessment of U.S. LNG Exports: Response to Comments, at 46-50 (May 19, 2025), https://www.energy.gov/sites/default/files/2025-10/ENERGY%2C%20ECONOMIC%2C%20AND%20ENVIRONMENTAL%20ASSESSMENT%20OF%20U.S.%20LNG%20EXPORTS_RESPONSE%20TO%20COMMENTS_0.pdf [hereinafter Response to Comments]).

⁶⁹ Amendment App. at 13.

⁷⁰ *See supra* § I (Current Proceeding).

⁷¹ Comment of Shea Centore, *supra* note 27.

requested export commencement extension and/or term extension. The other statements in the comment are not directly related to the requested extension—including that “we should switch to Free Trade Agreements” and that “the American people need better transparency and accountability of which countries we are providing which resources to”⁷²—and thus we do not take those statements into account below.

1. Extension of Export Commencement Deadline

Cameron LNG asserts that, consistent with NGA section 3(a), good cause exists to extend its current export commencement deadline set forth in Order No. 3846-A from May 5, 2026, to March 16, 2033.⁷³ As noted above, FERC recently issued an order extending Cameron LNG’s construction and in-service deadline for the Amended Expansion Project to March 16, 2033.⁷⁴ Cameron LNG’s requested commencement extension to March 16, 2033, would align these FERC and DOE deadlines.⁷⁵ Although DOE has the responsibility to independently evaluate any application to extend the deadline by which exports must commence from the Expansion Project (and the discretion to impose a different deadline than FERC), we nonetheless find FERC’s grant of the extension to be a compelling factor. Based on the same facts submitted to DOE in the Amendment Application, FERC determined that an extension of the construction and in-service deadline to March 16, 2033, was appropriate.

Next, we find that Cameron LNG has presented uncontested evidence that it has made substantial progress in developing the Expansion Project through a variety of commercial, financial, legal, and physical efforts—including, for example, executing LTAs for 100% of the

⁷² *Id.*

⁷³ Amendment App. at 8.

⁷⁴ See *supra* note 22 (FERC 2025 Ext. Order).

⁷⁵ See Amendment App. at 8.

amended Expansion Project’s capacity.⁷⁶ Based on this evidence, we agree with Cameron LNG that the requested extension is necessary to allow Cameron LNG to complete the enhanced Train 4 and realize the significant benefits of the amended Expansion Project.⁷⁷

Moreover, in describing its need for the extension, Cameron LNG describes both “unforeseen delays that transpired due to circumstances surrounding its joint-venture owners” and its regulatory efforts to obtain FERC approval of its amendments to the Expansion Project, which resulted in the FERC Amendment Order issued in March 2023.⁷⁸ In particular, we note that Cameron LNG proposed the modifications to the Expansion Project in response to customer requests “to enhance the efficiency and reliability of [these] remaining facilities.”⁷⁹ We agree with Cameron LNG’s suggestion that it is reasonable for project developers to “proactively and voluntarily enhance their previously approved projects to align with [their] customers’ evolving efficiency and environmental goals.”⁸⁰ Accordingly, we find that granting the requested commencement extension will provide the additional time necessary for Cameron LNG to reach a positive final investment decision on Train 4 and ultimately to construct and begin operating the redesigned Expansion Project.⁸¹

Additionally, DOE agrees with Cameron LNG that granting the requested commencement extension “will not disturb [DOE’s] underlying public interest determinations” for Order No. 3846, as amended.⁸² Indeed, a grant of the commencement extension—as well as

⁷⁶ *See supra* at 8.

⁷⁷ *See* Amendment App. at 10-11 (discussing the economic and employment benefits associated with the amended Expansion Project, set forth in the ICF Report).

⁷⁸ *Id.* at 9-10.

⁷⁹ *Id.* at 10.

⁸⁰ *Id.* at 11.

⁸¹ *See id.* at 12.

⁸² *Id.* at 10.

the lower authorized export volume discussed below—is expected to result in a lower total volume of LNG exports over the term of the authorization.

Nonetheless, based on the evidence discussed herein, we find that the requested extension would support the economic and energy security benefits identified by DOE in approving the exports in Order No. 3846, as amended. To the extent more recent data are relevant, we agree with Cameron LNG that DOE’s 2024 LNG Export Study⁸³ supports continued exports of U.S. LNG, based on far-reaching positive benefits to the U.S. economy and energy security.⁸⁴

DOE has explained that, to demonstrate good cause for an export commencement extension, “it is sufficient for an authorization holder to demonstrate that it has made good faith efforts to meet its existing export commencement deadline but encountered circumstances that prevented it from doing so.”⁸⁵ For the reasons set forth above, and taking into account the commenter’s opposition, we find that Cameron LNG has met this standard.

2. Partial Vacatur of Export Volume

Under the FERC Amendment Order discussed above, the certificated capacity of the Expansion Project is now 6.75 mtpa of LNG, or 350 Bcf/yr of natural gas, sourced from Train 4 only.⁸⁶ We thus agree with Cameron LNG that “[i]t is no longer necessary” for it to export the

⁸³ See U.S. Dep’t of Energy, Office of Fossil Energy & Carbon Management, *Energy, Economic, & Environmental Assessment of U.S. LNG Exports* (Dec. 2024), <https://hgeo.energy.gov/app/docketindex/docket/index/30> [hereinafter 2024 LNG Export Study or 2024 Study] (providing links).

⁸⁴ See Amendment App. at 13; see also Response to Comments, *supra* note 68, at 46-48. Although the 2024 Study included an environmental analysis, DOE has determined that it is appropriate to rely “only on the economic analysis in the 2024 Study, as well as DOE’s related findings on energy security.” *Venture Global Calcasieu Pass, LLC*, DOE/FECM Order No. 4346-B, Docket No. 15-25-LNG, Order Amending Long-Term Authorization to Export Liquefied Natural Gas to Non-Free Trade Agreement Nations, at 15-16 (Aug. 4, 2025); see also Response to Comments cover page (Oct. 7, 2025 update).

⁸⁵ *Lake Charles LNG Export Co., LLC*, DOE/FECM Order Nos. 3868-E and 4010-E, Docket Nos. 13-04-LNG and 16-109-LNG, Order Amending Long-Term Authorizations to Export Liquefied Natural Gas to Non-Free Trade Agreement Countries, at 35 (Aug. 22, 2025).

⁸⁶ See Amendment App. at 5, 14; FERC Amendment Order at P 5.

full 515 Bcf/yr of natural gas previously authorized by DOE in Order No. 3846 for Trains 4 and 5.⁸⁷

Accordingly, DOE finds good cause to grant Cameron LNG’s request for partial vacatur. As set forth in the amendment below, Cameron LNG’s authorized non-FTA export volume has been reduced to 350 Bcf/yr of natural gas, reflecting the vacatur of 165 Bcf/yr of natural gas associated with the now-eliminated Train 5.

3. Amendment to Export Term and Addition of Make-Up Period

Cameron LNG is currently authorized to export the LNG through December 31, 2050, the standard export term for non-FTA authorizations under the 2050 Policy Statement.⁸⁸ In the Amendment Application, Cameron LNG requests an amended export term that is “the later of twenty years after the date of first commercial export or December 31, 2050, with an additional three-year make-up period.”⁸⁹ Cameron LNG contends that, if DOE grants the requested commencement extension through March 16, 2033, it is likely that its current export term ending on December 31, 2050, would be less than 20 years, which it states is “the industry standard for the long-term LNG sale and purchase agreements that support the financing of LNG export terminals” such as the Expansion Project.⁹⁰

In DOE/FECM Order No. 5292-A, issued on June 30, 2025, DOE addressed a similar request made by PALNG Phase II concerning its non-FTA authorization.⁹¹ DOE recognized that, with the passage of time since the 2050 Policy Statement was implemented in 2020, together with the time required for the construction of an authorization holder’s associated LNG

⁸⁷ Amendment App. at 14.

⁸⁸ See, e.g., *Cameron LNG, LLC*, DOE/FE Order No. 3846-B, at 7-8, 15-16 (Ordering Para. G).

⁸⁹ Amendment App. at 1 (emphasis added); see also *id.* at 13.

⁹⁰ *Id.* at 12.

⁹¹ See *Port Arthur LNG Phase II, LLC*, DOE/FECM Order No. 5292-A, at 2-4.

export facility, “a standard 20-year contract now could extend beyond December 31, 2050.”⁹² On this basis, DOE determined that “it is in the public interest under NGA section 3(a)—as well as consistent with Executive Order 14154, *Unleashing American Energy*,⁹³ and DOE’s past practice—to allow three additional years for PALNG Phase II to export the approved volume of LNG from the Expansion Project beyond December 31, 2050.”⁹⁴ Further, DOE determined that “it is reasonable to reinstate a three-year Make-Up Period, through December 31, 2053,” for other non-FTA authorization holders, as well.⁹⁵

Here, we recognize that if Cameron LNG commences exports on March 16, 2033, under the amended export commencement deadline granted herein, it will have just under 18 years to export its non-FTA volume before the export term ends on December 30, 2050. Thus, consistent with DOE’s current practice, DOE grants Cameron LNG’s request for a three-year Make-Up Period, through December 31, 2053.⁹⁶ With this Make-Up Period, Cameron LNG will have almost 21 years to export the approved volume of LNG from the Expansion Project, which we find is sufficient to fulfill a standard 20-year contract.⁹⁷

For this reason, and taking into account the commenter’s opposition, we find it appropriate to maintain Cameron LNG’s existing export term and grant the request in part. In the PALNG Phase II order, DOE explained that it “is not changing the standard long-term non-FTA export term set forth in the 2050 Policy Statement, lasting through December 31, 2050.”⁹⁸

⁹² *See id.* at 4-5.

⁹³ Exec. Order No. 14154 of January 20, 2025, *Unleashing American Energy*, 90 Fed. Reg. 8353, 8357 (Jan. 29, 2025).

⁹⁴ *Port Arthur LNG Phase II, LLC*, DOE/FECM Order No. 5292-A, at 3-4.

⁹⁵ *Id.* at 5.

⁹⁶ *See id.* at 3-4.

⁹⁷ *See id.* at 5 (noting that such long-term contracts are necessary for an authorization holder to export the volumes of LNG that DOE found 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”) (citation omitted).

⁹⁸ *Port Arthur LNG Phase II, LLC*, DOE/FECM Order No. 5292-A, at 3.

Further, Cameron LNG’s arguments do not provide a basis to do so here. For example, although Cameron LNG notes DOE’s observation in the 2050 Policy Statement that “a 30-year export term would better match the operational life of LNG export facilities,”⁹⁹ DOE’s statement was made in 2020 to support the export term ending on December 31, 2050 (*i.e.*, then a 30-year period).¹⁰⁰ DOE did *not* indicate that it would be effectively resetting every export term for a 30-year period once an authorization holder commenced exports. Accordingly, in the amendment below, DOE provides a three-year Make-Up Period and maintains Cameron LNG’s existing export term ending on December 31, 2050. If, in the future, DOE establishes a standard non-FTA export term beyond December 31, 2050, Cameron LNG may request an extension to its current export term based on the evidence then available.

B. Environmental Review

DOE’s NEPA procedures provide for a categorical exclusion if neither an environmental assessment nor an environmental impact statement is required—specifically, categorical exclusion B5.7, *Export of natural gas and associated transportation by marine vessel*.¹⁰¹ On April 30, 2026, DOE issued a categorical exclusion determination for the amendments to Cameron LNG’s non-FTA authorization.¹⁰²

ORDER

Pursuant to sections 3 and 16 of the Natural Gas Act, DOE hereby orders as follows:

A. Ordering Paragraph A of Order No. 3846, as amended by Order No. 3846-B, is amended to state as follows:

Cameron LNG, LLC is authorized to export domestically produced

⁹⁹ Amendment App. at 13 (emphasis in original).

¹⁰⁰ See 2050 Policy Statement, 85 Fed. Reg. at 52,240 (discussing benefits of 30-year export term for long-term LNG exports).

¹⁰¹ See 10 C.F.R. Part 1021, Subpt. D, App. B, Categorical Exclusion B5.7.

¹⁰² See Categorical Exclusion Determination, *supra* note 36.

LNG by vessel from Train 4 of the Cameron Terminal (Expansion Project), located in Cameron and Calcasieu Parishes, Louisiana. The volume authorized in this Order is equivalent to 350 Bcf/yr of natural gas¹⁰³ for a term commencing on the date of first export and extending through December 31, 2050. Cameron LNG may continue exporting any Make-Up Volume for a three-year Make-Up Period following this export term, *i.e.*, through December 31, 2053.¹⁰⁴ Cameron 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.¹⁰⁵

This amended Ordering Paragraph A supersedes Ordering Paragraphs A and B in Order No. 3846-B in their entirety.

B. Ordering Paragraph D of Order No. 3846, as amended by Order No. 3846-A, is amended to state as follows:

Cameron LNG must commence export operations using the planned liquefaction facilities no later than March 16, 2033.

This amended Ordering Paragraph D supersedes Ordering Paragraph D in Order No. 3846-A in its entirety.

¹⁰³ This amended non-FTA volume reflects Cameron LNG's requested vacatur of 165 Bcf/yr of natural gas from its original authorized volume (515 Bcf/yr of natural gas).

¹⁰⁴ This three-year Make-Up Period does not affect or modify Cameron LNG's approved non-FTA export volume, as modified herein (350 Bcf/yr of natural gas). Insofar as Cameron LNG may seek to export additional volumes not previously authorized, it will be required to obtain appropriate authorization from DOE.

¹⁰⁵ 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).

C. Any other references to “Trains 4 and 5” and “515 Bcf/yr of natural gas” in the Terms and Conditions and/or Ordering Paragraphs of Order No. 3846, or its amendments, are further amended to “Train 4” and “350 Bcf/yr of natural gas,” respectively.

D. All other obligations, rights, and responsibilities established by DOE/FE Order No. 3846, as amended, remain in effect.

Issued in Washington, D.C., on April 30, 2026.

AMY SWEENEY

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

APPENDIX

Table 1: Orders Issued by DOE for the Long-Term Export of Domestically Produced LNG from the Cameron LNG Terminal to FTA Countries

Docket No.	Order No.	Date Originally Issued	Most Recent Amendment as of This Order	Trains	Volume (Bcf/yr)
11-145-LNG	3059	Jan. 17, 2012	3059-B	1-3	620
14-204-LNG	3620	April 9, 2015	3620-A	1-3	152
15-36-LNG	3680	July 10, 2015	3680-C	4	350
Total FTA Volume					1,122

Table 2: Orders Issued by DOE for the Long-Term Export of Domestically Produced LNG from the Cameron LNG Terminal to Non-FTA Countries

Docket No.	Order No.	Date Originally Issued	Most Recent Amendment as of This Order	Trains	Volume (Bcf/yr)
11-162-LNG	3391	Sept. 10, 2014	3391-C	1-3	620
15-67-LNG	3797	Mar. 18, 2016	3797-A	1-3	152
15-90-LNG	3846	July 15, 2016	3846-C	4	350
Total Non-FTA Volume					1,122