

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

ST LNG, LLC)
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_____)

DOCKET NO. 25-155-LNG

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

DOE/HGEO ORDER NO. 5414

APRIL 22, 2026

I. DESCRIPTION OF REQUEST

On December 10, 2025, ST LNG, LLC (ST LNG) filed an application (Application)¹ with the Department of Energy's (DOE) Office of Fossil Energy and Carbon Management (FECM) (now known as the Hydrocarbons and Geothermal Energy Office)² under section 3 of the Natural Gas Act (NGA).³ ST LNG requests long-term, multi-contract authorization to export domestically produced liquefied natural gas (LNG) in a volume equivalent to 460 billion cubic feet per year (Bcf/yr) of natural gas (1.26 Bcf per day (Bcf/d)), or approximately 8.4 million metric tons per annum (mtpa) of LNG.⁴ ST LNG seeks authorization to export the LNG by vessel from its proposed deepwater port (DWP) export terminal project, the ST LNG DWP Development Project (Project), to be located off the southeast coast of Matagorda, Texas.⁵

ST LNG requests authorization to export this LNG to any country with which trade is not prohibited by U.S. law or policy.⁶ This includes both countries with which the United States currently has, or in the future enters into, a free trade agreement (FTA) requiring national treatment for trade in natural gas (FTA countries),⁷ and any other country with which trade is not prohibited by U.S. law or policy (non-FTA countries).⁸ ST LNG requests both the FTA and

¹ ST LNG, LLC, Application for Long-Term Authorization to Export Liquefied Natural Gas to Free Trade Agreement Nations and Non-Free Trade Agreement Nations, Docket No. 25-155-LNG (Dec. 10, 2025) [hereinafter ST LNG 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). DOE uses the acronym in effect at the time of each order or action discussed herein.

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 ST LNG App. at 3.

⁵ *Id.* at 3-4.

⁶ *Id.* at 3.

⁷ 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.

⁸ 15 U.S.C. § 717b(a).

non-FTA authorization on a non-additive basis for a term to commence on the date of first export following the start of commercial operation of the Project, and extending through December 31, 2050, plus a three-year Make-Up Period, consistent with recent DOE practice.⁹ ST LNG requests this authorization on its own behalf and as agent for other entities that hold title to the LNG at the time of export.¹⁰

The portion of ST LNG's Application that seeks authorization to export domestically produced LNG to FTA countries is being reviewed pursuant to NGA section 3(c), 15 U.S.C. § 717b(c), and approved in this Order. The portion of the Application that seeks authorization to export domestically produced LNG to non-FTA countries will be reviewed pursuant to NGA section 3(a), 15 U.S.C. § 717b(a), and addressed in a separate order.¹¹

II. **BACKGROUND**

Applicant. ST LNG is a Florida limited liability company with its principal place of business in Rockville, Maryland. ST LNG states that it is a wholly-owned subsidiary of Tak Investment Inc., which is wholly-owned by Founder and CEO Sharad Tak.¹²

Proposed ST LNG Project. ST LNG states that the Project will be constructed, owned and located in Federal waters at Brazos Outer Continental Shelf Lease Block BA-476, approximately 10.4 nautical miles (19.2 kilometers) offshore Matagorda, Texas, in 65 to 72 feet

⁹ ST LNG App. at 3, 9. *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).

¹⁰ ST LNG App. at 3, 9.

¹¹ *See* ST LNG, LLC, Application for Long-Term Authorization to Export Liquefied Natural Gas to Non-Free Trade Agreement Nations, 90 Fed. Reg. 60,083 (Dec. 23, 2025).

¹² ST LNG App. at 3-4.

(19.8 to 21.9 meters) of water, in the Gulf of America.¹³ According to ST LNG, the Project will be a deepwater port under the Deepwater Port Act of 1974, as amended (DWPA).¹⁴ ST LNG states that it has filed an application for a license to construct, own, and operate the Project pursuant to the DWPA, and in accordance with the United States Coast Guard (USCG) and the Maritime Administration’s (MARAD) implementing regulations.¹⁵

ST LNG asserts that the Project will be “developed in four (4) phases, each phase being comprised of identical components and equipment designed to produce nominally 2.1 MTPA of LNG.”¹⁶ ST LNG states that each phase will comprise of three main fixed platforms and one smaller fixed offshore platform.¹⁷ According to ST LNG, the three main platforms will consist of (i) a LNG liquefaction platform, (ii) a natural gas treatment platform, and (iii) an accommodations and utility platform. In addition, ST LNG notes that each phase will include one LNG transfer platform, a bridge support trestle, and a dolphin mooring system comprising of three berthing dolphins and six mooring dolphins.¹⁸

ST LNG states that the Project will be connected to a single semi-permanently moored floating LNG storage unit (FSU), and an interconnected lateral pipeline.¹⁹ According to ST LNG, the LNG “would be loaded from the FSU onto standard LNG ocean going carriers

¹³ See *id.* at 4, 6. ST LNG provides a map showing the location of the Project as Appendix B to the Application.

¹⁴ 33 U.S.C. 1501 *et seq.* The DWPA “establishes a licensing system for the ownership, construction, operation, and decommissioning of deepwater port structures located beyond the U.S. territorial sea for the import and export of oil and natural gas.” ST LNG App. at 5 n.2 (quoting MARAD website).

¹⁵ ST LNG App. at 6 (citing 33 U.S.C. Part 148). ST LNG states that MARAD and USCG will conduct an evaluation of the potential impacts of the Project on the environment pursuant to the National Environmental Policy Act (NEPA). See *id.* at 13. We take notice that ST LNG filed its application with MARAD and USCG, pursuant to the DWPA, on June 9, 2025. See U.S. Dep’t of Transportation, Deepwater Port License Application: ST LNG Deepwater Port Development Project; Notice of Application, 90 Fed. Reg. 29,930 (July 7, 2025).

¹⁶ See *id.* at 6.

¹⁷ *Id.*

¹⁸ *Id.*

¹⁹ *Id.* at 7.

(‘LNGCs’) with nominal cargo capacities between 125,000 and 180,000 cubic meters (‘m³’), with an average expected capacity of 146,000 m³, for the export of LNG[.]”²⁰

ST LNG asserts that other than the temporary construction staging areas, there will be no permanent onshore facilities associated with the Project.²¹ ST LNG states that it expects Phase I of the Project to commence exports in September 2029, and subsequently, “[e]ach phase will be staggered approximately eighteen (18) months for ease of constructability.”²²

Source of Supply. ST LNG states that it plans to export domestically produced natural gas sourced from two major natural gas supply hubs, the Tres Palacios gas storage system and Katy hub, both with interconnections to multiple major natural gas pipelines.²³ According to ST LNG, feed gas to the Project will be transported via the existing Transco offshore natural gas pipeline system, approximately 10 miles offshore near Brazos Block 450, which can reverse its current operating flow to take natural gas from onshore to offshore, and a newly constructed lateral pipeline approximately five kilometers in length that will connect the Transco offshore pipeline system to the Project.²⁴

Business Model. ST LNG requests this authorization on its own behalf and as agent for other entities who will hold title to the LNG at the time of export.²⁵ ST LNG states that it will comply with all DOE requirements for exporters and agents, including registration requirements.²⁶

²⁰ *Id.*

²¹ ST LNG App. at 8.

²² *Id.* at 7.

²³ *Id.* at 7-8.

²⁴ *Id.* at 7.

²⁵ *Id.* at 3, 9.

²⁶ *See id.* at 9-10.

ST LNG states that it has not yet entered into long-term natural gas supply or export contracts for the requested exports.²⁷ ST LNG further states that it will file all long-term, binding contracts associated with the exports of LNG from the Project, once executed, in accordance with DOE's established policy and precedent.²⁸

III. FINDINGS

(1) 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 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 FTA portion of ST LNG's Application falls within section 3(c), as amended, and therefore, DOE grants the requested FTA authorization without modification or delay.²⁹

(2) In light of DOE's statutory obligation to grant the FTA portion of this Application without modification or delay, there is no need for DOE to review other arguments asserted by ST LNG in support of the Application. The instant grant of authority should not be read to indicate DOE's views on those arguments or on ST LNG's request for non-FTA export authorization.

(3) The countries with which the United States has a FTA requiring national treatment for trade in natural gas currently are: Australia, Bahrain, Canada, Chile, Colombia, Dominican

²⁷ ST LNG App. at 10.

²⁸ *Id.*

²⁹ DOE further finds that the requirement for public notice of applications and other hearing-type procedures in 10 C.F.R. Part 590, are applicable only to applications seeking to export natural gas, including LNG, to non-FTA countries.

Republic, El Salvador, Guatemala, Honduras, Jordan, Mexico, Morocco, Nicaragua, Oman, Panama, Peru, Republic of Korea, and Singapore.

(4) ST LNG requests authorization to export LNG on its own behalf and as agent for other entities that hold title to the LNG at the time of export. DOE previously addressed the issue of Agency Rights in DOE/FE Order No. 2913,³⁰ which granted Freeport LNG Expansion, L.P., *et al.* (collectively, FLEX) authority to export LNG to FTA countries. In that order, DOE approved a proposal by FLEX to register each LNG title holder for whom FLEX sought to export LNG as agent. DOE found that this proposal was an acceptable alternative to the non-binding policy adopted by DOE in *The Dow Chemical Company*,³¹ which established that the title for all LNG authorized for export must be held by the authorization holder at the point of export. DOE finds that the same policy considerations that supported DOE's acceptance of the alternative registration proposal in DOE/FE Order No. 2913 apply here as well.

DOE has reiterated its policy on Agency Rights procedures in other authorizations, including *Cameron LNG, LLC*, DOE/FE Order No. 3680.³² In that order, DOE determined that, in LNG export orders in which Agency Rights have been granted, DOE shall require registration materials filed for, or by, an LNG title-holder (Registrant) to include the same company identification information and long-term contract information of the Registrant as if the Registrant had filed an application to export LNG on its own behalf.³³

³⁰ *Freeport LNG Expansion, L.P., et al.*, DOE/FE Order No 2913, Docket No. 10-160-LNG, Order Granting Long-Term Authorization to Export Liquefied Natural Gas from Freeport LNG Terminal to Free Trade Nations (Feb. 10, 2011).

³¹ *The Dow Chemical Company*, DOE/FE Order No. 2859, Docket No. 10-57-LNG, Order Granting Blanket Authorization to Export Liquefied Natural Gas, at 7-8 (Oct. 5, 2010), discussed in *Freeport LNG*, DOE/FE Order No. 2913, at 7-8.

³² *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).

³³ *Id.* at 8-9.

To ensure that the public interest is served, this authorization requires that, where ST LNG proposes to export LNG as agent, it must register the Registrants with DOE in accordance with the procedures and requirements described herein.

(5) Section 590.202(b) of DOE's regulations requires applicants to supply transaction-specific factual information "to the extent practicable."³⁴ Additionally, DOE regulations at 10 C.F.R. § 590.202(e) allow confidential treatment of the information supplied in support of or in opposition to an application if the submitting party requests such treatment, shows why the information should be exempted from public disclosure, and DOE determines it will be afforded confidential treatment in accordance with 10 C.F.R. § 1004.11.

(6) DOE will require that ST LNG file or cause to be filed with DOE any relevant long-term commercial agreements or contracts pursuant to which ST LNG exports LNG as agent for a Registrant once those agreements or contracts have been executed. DOE finds that the submission of all such agreements or contracts within 30 days of their execution using the procedures described below will be consistent with the "to the extent practicable" requirement of section 590.202(b). By way of example and without limitation, a "relevant long-term commercial agreement" includes an agreement with a minimum term of two years.

(7) DOE also will require ST LNG to file any long-term contracts ST LNG enters into providing for the long-term export of LNG on its own behalf from the proposed Project. DOE finds that the submission of these contracts within 30 days of their execution using the procedures described below will be consistent with the "to the extent practicable" requirement of section 590.202(b).

³⁴ 10 C.F.R. § 590.202(b).

(8) In addition, DOE finds that section 590.202(c) of DOE's regulations³⁵ requires that ST LNG file, or cause to be filed, all long-term contracts associated with the long-term supply of natural gas to the Project, whether signed by ST LNG or the Registrant, within 30 days of their execution.

(9) DOE recognizes that some information in ST LNG's or a Registrant's long-term commercial agreements associated with the export of LNG, and/or long-term contracts associated with the long-term supply of natural gas to the Project, may be commercially sensitive. DOE therefore will provide ST LNG the option to file or cause to be filed either unredacted contracts, or in the alternative: (A) ST LNG may file, or cause to be filed, long-term contracts under seal, but it also will file for public posting, within 30 days of the contract execution date, either: (i) a copy of each long-term contract with commercially sensitive information redacted, or (ii) a summary of all major provisions of the contract(s) including, but not limited to, the parties to each contract, contract term, quantity, any take or pay or equivalent provisions/conditions, destination, re-sale provisions, and other relevant provisions; and (B) the filing must demonstrate why the redacted or non-disclosed information should be exempted from public disclosure.³⁶

To ensure that DOE destination and reporting requirements included in the Order are conveyed to subsequent title holders, DOE will include as a condition of this authorization that future contracts for the sale or transfer of LNG exported pursuant to the Order shall include an acknowledgement of these requirements.

(10) Consistent with DOE's current practice and ST LNG's request, ST LNG will be permitted to continue exporting the approved volume of LNG from the Project for a total of three

³⁵ *Id.* § 590.202(c).

³⁶ *Id.* § 590.202(e) (allowing confidential treatment of information in accordance with 10 C.F.R. § 1004.11).

years following the end of the export term on December 31, 2050, solely to export any approved volume of LNG that it is unable to export during the original export period (the Make-Up Volume). The three-year term during which the Make-Up Volume may be exported, known as the Make-Up Period, will extend through December 31, 2053.³⁷

ORDER

Pursuant to section 3 of the NGA, it is ordered that:

A. ST LNG, LLC (ST LNG) is authorized to export domestically produced LNG by vessel from the proposed ST LNG DWP Development Project, to be located in Federal waters at Brazos Block BA-476, in the Gulf of America, off the southeast coast of Matagorda, Texas. The volume authorized in this Order is equivalent to 460 Bcf/yr of natural gas for a term to commence on the date of first export from the Project, and to extend through December 31, 2050. ST LNG may continue exporting any Make-Up Volume for a three-year Make-Up Period following the export term, *i.e.*, through December 31, 2053.³⁸ ST LNG is authorized to export this LNG on its own behalf and as agent for other entities that hold title to the LNG, pursuant to one or more contracts of any duration.³⁹

B. This LNG may be exported to Australia, Bahrain, Canada, Chile, Colombia, Dominican Republic, El Salvador, Guatemala, Honduras, Jordan, Mexico, Morocco, Nicaragua, Oman, Panama, Peru, Republic of Korea, and Singapore, and to any nation with which the

³⁷ 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).

³⁸ This three-year Make-Up Period does not affect or modify the export volume authorized in this Order. Insofar as ST LNG may seek to export additional volumes not previously authorized, it will be required to obtain appropriate authorization from DOE.

³⁹ These contracts may include the export of commissioning volumes prior to the start of facility operations 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. 2,243, 2,245 (Jan. 12, 2021).

United States subsequently enters into a FTA requiring national treatment for trade in natural gas, provided that the destination nation has the capacity to import LNG via ocean-going vessels. FTA countries are currently identified by DOE at: <https://www.energy.gov/hgeo/how-obtain-authorization-import-and-or-export-natural-gas-and-lng>.

C. ST 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 United States Department of the Treasury. Failure to comply with this requirement could result in rescission of this authorization and/or other civil or criminal remedies.

D. (i) ST 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-31) 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 must be filed within 30 days of their execution and may be filed under seal, as described above.

(ii) ST 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 above.

E. ST 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 ST LNG with all information necessary to permit ST 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 D 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).

F. ST LNG, or others for whom ST 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. 5414, issued April 22, 2026, in Docket No. 25-155-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 ST LNG, LLC that identifies the country (or countries) into which the LNG or natural gas was actually delivered, and to include in any resale contract for such LNG the necessary conditions to ensure that ST LNG, LLC is made aware of all such actual destination countries.

G. Within two weeks after the first export of domestically produced LNG from the Project occurs, ST LNG shall provide written notification of the date of first export to DOE.

H. ST LNG shall file with the Office of Global Energy Security, on a semi-annual basis, written reports describing the progress of the proposed Project. The reports shall be filed on or

by April 1 and October 1 of each year, and shall include information on the progress of the Project, the date the Project is expected to be operational, and the status of any long-term supply and export contracts associated with the long-term export of LNG from the Project.

I. With respect to any change in control of the authorization holder, ST LNG must comply with DOE's Procedures for Change in Control Affecting Applications and Authorizations to Import or Export Natural Gas.⁴⁰ For purposes of this Ordering Paragraph, a "change in control" shall include any change, directly or indirectly, of the power to direct the management or policies of ST LNG, whether such power is exercised through one or more intermediary companies or pursuant to an agreement, written or oral, and whether such power is established through ownership or voting of securities, or common directors, officers, or stockholders, or voting trusts, holding trusts, or debt holdings, or contract, or any other direct or indirect means.⁴¹

J. Monthly Reports: With respect to the exports authorized by this Order, ST 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. The first monthly report required by this Order is due not later than the 30th day of the month following the month of first export. In subsequent months, 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>.

⁴⁰ See U.S. Dep't of Energy, Procedures for Changes in Control Affecting Applications and Authorizations to Import or Export Natural Gas, 79 Fed. Reg. at 65,541-42 (Nov. 5, 2014).

⁴¹ See *id.* at 65,542.

(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>.

Issued in Washington, D.C., on April 22, 2026.

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