May 13, 2026

Ms. Amy Sweeney
Office of Global Energy Security
Hydrocarbons and Geothermal Energy Office
U.S. Department of Energy
EX-34, Room 3E-056
Forrestal Building
1000 Independence Avenue, S.W.
Washington, DC 20585

Re: **Power LNG LLC — Application for Long-Term Authorization to Export Liquefied Natural Gas to Free Trade Agreement Countries**

Dear Ms. Sweeney:

Pursuant to Section 3 of the Natural Gas Act ("NGA"), 15 U.S.C. § 717b (2018), and Part 590 of the Department of Energy's ("DOE") regulations, 10 C.F.R. Part 590 (2019), Power LNG LLC ("Power") hereby submits its application for long-term authorization to export Liquefied Natural Gas ("LNG") to Free Trade Agreement ("FTA") countries. Enclosed please find the following documents comprising Power's complete application package:

- Application of Power LNG LLC for Long-Term Authorization to Export Liquefied Natural Gas to Free Trade Agreement Countries
- Appendix A — Opinion of Counsel
- Appendix B — Verification
- Appendix C — Evidence of Site Control

Power seeks authorization to export the equivalent of approximately 51.75 billion cubic feet ("Bcf") of LNG per annum of domestically produced natural gas in liquefied form, for a term ending on December 31, 2050, with a three (3)-year make-up period through December 31, 2053. Power will export LNG using Department of Transportation-approved International Organization for Standardization ("ISO") containers via ocean-going carrier from its proposed liquefaction and export facility located at 1000 Seawolf Parkway, Galveston, Texas 77554, on Pelican Island within the Port of Galveston, Texas, to any country with which the United States currently has, or in the future enters into, an FTA requiring national treatment for trade in natural gas.

Because this Application requests authorization to export LNG only to FTA countries, it is subject to review pursuant to Section 3(c) of the NGA, which requires that such applications shall be "deemed to be consistent with the public interest" and "granted without modification or delay." 15 U.S.C. § 717b(c) (2018). Power respectfully requests that DOE/HGEO grant this Application promptly and without modification, consistent with the statutory presumption.

Power also notes that it currently holds a long-term FTA export authorization issued under DOE/FE Order No. 4994 in Docket No. 23-11-LNG. This Application is intended to supersede and replace that authorization in its entirety. Power respectfully requests that, concurrently and simultaneously with the issuance of the new long-term authorization requested

herein, DOE/HGEO vacate Order No. 4994 (Docket No. 23-11-LNG), such that the vacatur of the existing authorization and the effectiveness of the new authorization occur on the same date and at the same moment, with no gap in Power's export authorization and no period of dual effectiveness.

Power commits that, within thirty (30) days of execution, it will file with DOE/HGEO copies of all relevant export contracts and long-term natural gas supply agreements, including, to the extent required, a confidential non-redacted version and a publicly available redacted version or contract summary, consistent with DOE/HGEO practice. See, e.g., Blue Water Fuels, LLC, DOE/FE Order No. 4202 (2018).

Pursuant to 10 C.F.R. § 590.207, Power has submitted the required non-refundable filing fee of $50.00 electronically in accordance with DOE's current filing fee instructions. Power requests that all correspondence and communications regarding this Application be addressed to the contacts listed in Section II of the enclosed Application.

Please do not hesitate to contact us with any questions regarding this Application. We look forward to working with DOE/HGEO on this matter.

Respectfully submitted,

Dean M. Wallace, PMP
Managing Partner / Co-Founder
Power LNG LLC
26 Cmdr Runco Ln., Seabrook, Texas 77586
Tel: (240) 461-0201
Email: dean.wallace@power-lng.com

Enclosures

- Application of Power LNG LLC for Long-Term Authorization to Export Liquefied Natural Gas to Free Trade Agreement Countries
- Appendix A — Opinion of Counsel
- Appendix B — Verification
- Appendix C — Evidence of Site Control

LIST OF ACRONYMS AND ABBREVIATIONS

Bcf	Billion Cubic Feet
C.F.R.	Code of Federal Regulations
DOE	U.S. Department of Energy
DOE/HGEO	U.S. Department of Energy, Office of Global Energy Security – Hydrocarbons and Geothermal Energy Office
DOT	U.S. Department of Transportation
EPA	U.S. Environmental Protection Agency
FTA	Free Trade Agreement
HPL System	Houston Pipeline System
ISO	International Organization for Standardization
LNG	Liquefied Natural Gas
NEPA	National Environmental Policy Act
NGA	Natural Gas Act
NFPA	National Fire Protection Association
NPDES	National Pollutant Discharge Elimination System
PHMSA	Pipeline and Hazardous Materials Safety Administration
USCG	U.S. Coast Guard
U.S.C.	United States Code

UNITED STATES OF AMERICA
BEFORE THE DEPARTMENT OF ENERGY
OFFICE OF GLOBAL ENERGY SECURITY –
HYDROCARBONS AND GEOTHERMAL ENERGY OFFICE

In the Matter of	)	
	)	**HGEO Docket No. [26-____-LNG]**
POWER LNG LLC	)	

APPLICATION OF POWER LNG LLC FOR LONG-TERM AUTHORIZATION TO EXPORT LIQUEFIED NATURAL GAS TO FREE TRADE AGREEMENT COUNTRIES

Pursuant to Section 3 of the Natural Gas Act ("NGA")[1] and Part 590 of the Department of Energy's ("DOE") regulations,[2] Power LNG LLC ("Power") hereby submits this Application ("Application") to the DOE, Office of Global Energy Security – Hydrocarbons and Geothermal Energy Office ("DOE/HGEO") for long-term authorization to export Liquefied Natural Gas ("LNG"). Power seeks authorization to export the equivalent of approximately 51.75 billion cubic feet ("Bcf") of LNG per annum of domestically produced natural gas in liquefied form, for a term ending on December 31, 2050, with a three (3)-year make-up period through December 31, 2053. Power will export LNG using Department of Transportation-approved International Organization for Standardization ("ISO") containers[3] via ocean-going carrier from its proposed liquefaction and export facility located at 1000 Seawolf Parkway, Galveston, Texas 77554, on Pelican Island within the Port of Galveston, Texas ("Project Seawolf"), to any country 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. Power requests this authorization both on its own behalf and as agent for other LNG titleholders.[4]

I. DESCRIPTION OF THE APPLICANT

The exact legal name of the applicant is Power LNG LLC, a Limited Liability Company organized and existing under the laws of the State of Texas. Power is engaged in the development,

[1] 15 U.S.C. § 717b (2018).
[2] 10 C.F.R. Part 590 (2019).
[3] 49 C.F.R. Parts 171, 173, and 178 (U.S. Department of Transportation Hazardous Materials Regulations governing the use, testing, and certification of ISO containers for the transport of hazardous materials including cryogenic liquids); 49 C.F.R. § 173.318 (Cryogenic liquids in cargo tanks).
[4] 10 C.F.R. § 590.103(b) (2019) (requiring a certified statement that the signatory is a duly authorized representative of the applicant for applications filed by agents or on behalf of others).

construction, ownership, and operation of an LNG liquefaction and export facility for the production and export of liquefied natural gas. Power's principal activities include the planning, permitting, financing, and construction of LNG infrastructure designed to serve energy markets in FTA jurisdictions. Power's principal place of business is 26 Cmdr Runco Ln., Seabrook, Texas 77586.

This Application requests authority to export LNG only to countries with which the United States has or in the future enters into an FTA requiring national treatment for trade in natural gas. This Application is therefore subject to review pursuant to the standards established in the Energy Policy Act of 1992, pursuant to which Section 3(c) of the NGA requires that applications for authorization to export LNG to FTA countries shall be "deemed to be consistent with the public interest" and "granted without modification or delay."[5]

In support of this Application, Power respectfully states the following:

II. COMMUNICATIONS AND CORRESPONDENCE

Correspondence and communications regarding this Application should be addressed to the following:

Dean M. Wallace, PMP
Managing Partner / Co-Founder
Power LNG LLC
26 Cmdr Runco Ln., Seabrook, Texas 77586
Telephone: (240) 461-0201
Email: dean.wallace@power-lng.com

And

Austin Terry
Managing Partner / Co-Founder
Power LNG LLC
26 Cmdr Runco Ln., Seabrook, Texas 77586
Telephone: (713) 545-7124
Email: austin.terry@power-lng.com

III. DESCRIPTION OF THE PORT OF GALVESTON

Power seeks a long-term authorization to export domestically produced LNG from its proposed liquefaction and export facility ("Facility") located at 1000 Seawolf Parkway, Galveston, Texas 77554, on Pelican Island within the Port of Galveston that it will construct, own, and

[5] 15 U.S.C. § 717b(c) (2018). See also Energy Policy Act of 1992, Pub. L. No. 102-486, § 1201, 106 Stat. 2776 (1992) (codified at 15 U.S.C. § 717b(c)) (establishing the FTA deemed-consistent standard).

operate.[6] The Facility, known as "Project Seawolf," will be located on Pelican Island within the Port of Galveston, Texas. The Facility's address is 1000 Seawolf Parkway, Galveston, Texas 77554. Evidence of site control is provided in Appendix C.

A. Port of Galveston — Authority, Governance, and Site Control

The Port of Galveston (operating as the Galveston Wharves) is a separate utility of the City of Galveston, governed by a Board of Trustees appointed by the Galveston City Council. It operates as a full-service public port authority supporting commercial cargo operations, maritime services, and industrial development. The Port maintains security, access control, and maritime compliance consistent with applicable U.S. Coast Guard and federal port security requirements.

Power has executed an agreement with the Port of Galveston granting Power the exclusive right and option to negotiate and enter into a long-term ground lease "Lease" covering approximately thirty (30)-acres of marine and industrial property located at 1000 Seawolf Parkway, Galveston, Texas 77554, on Pelican Island within in the Port of Galveston. The Lease term is thirty (30) years with two (2) ten-year renewal options, providing Power with up to fifty (50) years of operational runway on Port-controlled land. The Lease is structured to become effective upon DOE/HGEO authorization of this Application. Documentation evidencing site control and the conditional nature of the Lease is included in Appendix C.

Pelican Island is situated within the Galveston Harbor complex and provides the following key infrastructure and access advantages:

(i) Direct access to the federally maintained Galveston Ship Channel;

(ii) Deepwater navigation to the Gulf of America;

(iii) Established marine traffic management under U.S. Coast Guard oversight;

(iv) Compatibility with industrial and maritime uses consistent with the Port's Board-approved land use designations; and

(v) Sufficient waterfront access for construction of a dedicated marine berth to support ISO container staging and ocean-going vessel operations.

B. Transportation and Logistical Connectivity

The Port of Galveston is a long-established deepwater port with direct access to the Gulf of America and a history of supporting maritime and industrial operations dating to its

[6] 10 C.F.R. § 590.202(a)(1) (2019) (requiring the application to include "[t]he location of the facilities to be used in the proposed exportation or importation and a description of the mode of transportation to be used").

establishment in 1825 — spanning two (2) centuries. The proposed Facility site benefits from established multimodal transportation infrastructure. The Facility will be accessed via Seawolf Parkway, which connects Pelican Island to the Galveston mainland and Interstate Highway 45 (I-45). I-45 serves as the primary interstate corridor linking Galveston to the Houston metropolitan area and provides direct connectivity to Interstate Highway 10 (I-10), a major east-west freight corridor serving the Gulf Coast region.

State and local roadways serving the Port are designed to accommodate industrial and port-related traffic and will support the movement of construction materials, modular liquefaction equipment, and outbound LNG ISO containers. The road network provides Power with efficient access to the Houston metropolitan area, including connections to the Houston Ship Channel industrial corridor, major natural gas market hubs, and pipeline interconnection points.

Power intends to enter into a long-term natural gas supply agreement with the Houston Pipeline System ("HPL System"), a subsidiary of Energy Transfer. The HPL System is an extensive network of intrastate natural gas pipelines, an underground Bammel storage reservoir, and related transportation assets that provide direct connectivity to our proposed liquefaction and export facility located at 1000 Seawolf Parkway, Galveston, Texas 77554, on Pelican Island within the Port of Galveston via existing pipeline infrastructure. Power anticipates utilizing existing pipeline infrastructure to supply the Facility with natural gas feedstock for liquefaction and subsequent ISO container export.

C. Industrial Compatibility and Land Use

The 30-acre Leased site consists of undeveloped industrial land within the Port's designated industrial area. Development on this greenfield port property enables the following: (i) a purpose-built liquefaction system configuration, including pad construction, modular unit installation foundations, and utility infrastructure, designed specifically to support the Facility's phased modular development plan; (ii) LNG storage infrastructure, including cryogenic storage tanks of appropriate capacity for Phase I and future expansion phases, and ISO container handling infrastructure; (iii) appropriate safety setbacks consistent with National Fire Protection Association ("NFPA") 59A and 49 C.F.R. Part 193,[7] and applicable U.S. Coast Guard ("USCG") maritime safety regulations,[8] as well as controlled access consistent with Port security

[7] NFPA 59A, Standard for the Production, Storage, and Handling of Liquefied Natural Gas (2023 ed.); 49 C.F.R. Part 193 (Pipeline Safety: Liquefied Natural Gas Facilities: Federal Safety Standards).

8 33 C.F.R. Part 127 (Waterfront Facilities Handling Liquefied Natural Gas and Liquefied Hazardous Gas); 33 C.F.R. Part 156 (Operations in Navigable Waters and the Contiguous Zone, including transfer operations).

requirements; and (iv) phased construction aligned with Power's operational development plan, allowing initial production capacity to be brought online and expanded incrementally as commercial agreements are executed and sales volumes increase.

The Port's industrial zoning and maritime use designations support energy-related infrastructure while maintaining appropriate separation from residential areas on the Galveston mainland. No residential or incompatible uses are present within the applicable safety setback distances for the proposed Facility.

D. Liquefaction Project

The Facility is designed for multiple modular liquefaction trains, each capable of producing approximately 13 Bcf per year of LNG, for a combined nameplate capacity of approximately 51.75 Bcf per year at full build-out. Phase I operations are anticipated to include the installation of an initial modular liquefaction train or trains sufficient to achieve Phase I production capacity of approximately 400,000 gallons of LNG per day (approximately 12.0 Bcf per year). The Facility is also designed to store up to fifty (50) stacked ISO containers during Phase I, with ISO container storage capacity scalable as the Facility expands through successive phases, consistent with final engineering, site layout, and applicable regulatory requirements. Power anticipates that the timing for completion of Phase I will be approximately twenty-four (24) months from the date on which Power receives final approval of all regulatory authorizations required to commence construction.

E. Truck Loading Facility and Dock Access

The Facility will include a dedicated truck loading facility designed to support the loading of LNG into U.S. Department of Transportation ("DOT")-approved ISO containers[9] for transport to the marine berth within the Port. The truck loading facility will include appropriate loading arms, metering equipment, cryogenic hose connections, and safety systems consistent with applicable standards for LNG vehicle loading operations, including applicable requirements under 49 C.F.R. Parts 171, 173, and 178.

In addition, the Facility will include construction of a dedicated marine berth or utilization of existing Port berth infrastructure to support ISO container loading onto ocean-going vessels for export. The berth will be designed and constructed to accommodate the types and sizes of ocean-going vessels anticipated to carry Power's LNG ISO containers to FTA destination markets. All

9 49 C.F.R. Parts 171, 173, and 178 (U.S. Department of Transportation Hazardous Materials Regulations governing the use, testing, and certification of ISO containers for the transport of hazardous materials, including cryogenic liquids); 49 C.F.R. § 173.318 (Cryogenic liquids in cargo tanks); ISO 1496-3 (Series 1 freight containers — specification and testing, Part 3: Tank containers for liquids, gases and pressurized dry bulk).

marine berth construction and operations will be conducted in compliance with applicable USCG requirements,[10] Port of Galveston operational requirements, and applicable federal and state permits.

F. ISO Container Storage

During Phase I operations, Power anticipates storing up to fifty (50) stacked ISO containers on site for a period of up to one (1) week. As the Facility progresses through planned expansion phases, ISO container storage capacity may increase as needed to support higher production and throughput volumes, consistent with final engineering, the site layout, and applicable regulatory requirements. All ISO container storage and stacking operations will be conducted in accordance with applicable safety requirements, including NFPA 59A and 49 C.F.R. Part 193,[11] as applicable, and consistent with manufacturer specifications and final engineered design.

IV. ENVIRONMENTAL REVIEW

All equipment that will be used at the Facility will meet applicable environmental performance standards established by governing regulatory authorities. Power respectfully states that approval of this Application will not constitute a federal action significantly affecting the human environment within the meaning of the National Environmental Policy Act ("NEPA"), 42 U.S.C. § 4321 et seq.,[12] beyond that contemplated by a standard LNG liquefaction and export facility authorization. Power further states that the design and specifications of the Facility will meet all local, state, and federal environmental permitting requirements and regulations, and the Facility will be permitted by the appropriate governing agency prior to commencement of construction and operations.

The modular liquefaction technology, in particular, results in a smaller construction footprint at any given phase compared to a conventional onsite-built plant, as discrete factory-assembled units are installed incrementally rather than constructing the full facility in a single mobilization. This phased construction footprint is expected to reduce near-term environmental disturbance during construction and is consistent with the Port of Galveston's industrial land use designations.

10 33 C.F.R. Part 127 (Waterfront Facilities Handling Liquefied Natural Gas and Liquefied Hazardous Gas); 33 C.F.R. Part 156 (Operations in Navigable Waters and the Contiguous Zone, including transfer operations); applicable U.S. Army Corps of Engineers permits under 33 U.S.C. § 403 (Rivers and Harbors Act, Section 10) and 33 U.S.C. § 1344 (Clean Water Act, Section 404) for construction of marine berth infrastructure.

11 49 C.F.R. Part 193 (Pipeline Safety: Liquefied Natural Gas Facilities: Federal Safety Standards); NFPA 59A, Standard for the Production, Storage, and Handling of Liquefied Natural Gas (2023 ed.).

12 42 U.S.C. § 4321 et seq. (National Environmental Policy Act of 1969).

V. LIQUEFACTION TECHNOLOGY

The Facility will incorporate a modular, factory-fabricated liquefaction configuration. Under this configuration, discrete liquefaction units are engineered, fabricated, and performance-tested at a factory prior to shipment and installation at the proposed liquefaction and export facility located at 1000 Seawolf Parkway, Galveston, Texas 77554, on Pelican Island within the Port of Galveston. Each modular unit is a self-contained, skid-mounted liquefaction system that operates under a standardized optimized mixed refrigerant liquefaction cycle and process configuration. Modules are installed sequentially, and additional units can be added as Power's contracted sales volumes grow, without requiring redesign of the Facility's core liquefaction process or modification to the export method.

The Facility is designed for multiple modular liquefaction trains, each capable of producing approximately 13 Bcf per year of LNG, for a combined nameplate capacity of approximately 51.75 Bcf per year at full build-out. Because each modular train is factory-assembled and performance-tested prior to installation, this approach enhances operational reliability, reduces construction risk and cost uncertainty, and supports predictable incremental capacity additions in response to actual customer demand.

Phase I operations are anticipated to include the installation of an initial modular liquefaction train or trains sufficient to achieve Phase I production capacity.

The facility design has an initial operational production capacity equivalent to approximately 400,000 gallons of LNG per day (approximately 12.0 Bcf per year) during Phase I, scalable upward through the addition of factory-fabricated modules as Power's offtake commitments grow.

Power anticipates that the timing for completion of Phase I of the Facility will be approximately twenty-four (24) months from the date on which Power receives final approval of all regulatory authorizations required to commence construction. Power will obtain all requisite regulatory approvals, including all applicable Pipeline and Hazardous Materials Safety Administration (“PHMSA”), USCG, U.S. Environmental Protection Agency (“EPA”), and state and local permits, prior to commencement of construction.

By authorizing the full modular build-out capacity of 51.75 Bcf per year at this stage will avoid the need for successive incremental DOE authorization requests as each additional modular train is placed into service. All existing DOE oversight, conditions, and reporting requirements

applicable to a long-term FTA export authorization will remain fully effective throughout each phase of project development and ongoing operations.

Power's modular development model is demand-responsive by design. Capacity can be expanded incrementally by adding factory-fabricated modular liquefaction units as customer offtake agreements are executed and commercial volumes grow. This approach avoids over-capitalization in early project phases, allowing Power to match capital deployment to actual contracted demand while retaining the regulatory authority to scale to full build-out capacity as the market develops. Each modular train is functionally identical, operating under the same standardized process parameters, ensuring uniform LNG quality and operational consistency across all phases of facility development.

Factory fabrication and pre-commissioning testing of each liquefaction module prior to site delivery substantially reduces field construction complexity, schedule risk, and cost uncertainty relative to conventional onsite construction of equivalent capacity. Because each module arrives at the Facility site fully fabricated and pre-tested, the scope of field construction work is limited primarily to civil foundations, utility connections, and module integration, rather than the extensive field fabrication, welding, and assembly required by a conventional stick-built or field-erected liquefaction plant.

Each modular liquefaction unit operates under the same standardized process parameters and liquefaction cycle, ensuring uniform LNG product quality, heating value, and compositional consistency across all production phases. The standardized process configuration also simplifies operator training, maintenance planning, and spare parts inventory management, supporting reliable and predictable operations over the full life of the Facility.

VI. AUTHORIZATION REQUESTED

Power requests a long-term authorization for a term ending on December 31, 2050, with a three (3)-year make-up period through December 31, 2053, to export up to the equivalent of approximately 51.75 Bcf of LNG per year of domestically produced natural gas in liquefied form by DOT-approved ISO container via ocean-going carrier from its Facility at 1000 Seawolf Parkway, Galveston, Texas 77554, on Pelican Island within the Port of Galveston, Texas ("Project Seawolf"), to any country with which the United States currently has, or in the future enters into, an FTA requiring national treatment for trade in natural gas.

The three (3)-year make-up period following the December 31, 2050, expiration date is requested consistent with recent DOE/HGEO practice for long-term LNG export authorizations. This make-up period would allow Power to export any authorized volumes but not exported prior to the expiration date, ensuring that the full benefit of the authorized export ceiling remains available to Power and its customers over the full operational life of the Facility.

Power requests this authorization both on its own behalf and as an agent for other LNG titleholders.[13] To ensure all exports are permitted and lawful under United States laws and policies, Power will comply with all DOE requirements for an exporter or agent, including but not limited to, registering with DOE/HGEO each LNG titleholder for whom Power seeks to export LNG and providing the requisite acknowledgments.[14] While DOE/HGEO regulations require applicants to submit information on the terms of export agreements and long-term natural gas supply agreements,[15] DOE/HGEO has found that an applicant need not submit this information with the original Application if no contracts have been executed at such time.[16] In such instances, DOE/HGEO has permitted applicants to submit such information within thirty (30) days of the execution of such contracts, which DOE/HGEO has found conforms to the requirement in its regulations that such information is submitted "when practicable."[17] Power requests that DOE/HGEO make the same finding in this proceeding and commits that, within thirty (30) days of execution, it will file a copy of all such contracts with DOE/HGEO, including to the extent required, a confidential, non-redacted version and a publicly available, redacted version or contract summary.

Power also reserves the right to seek from DOE/HGEO separate authorization to export LNG to countries with which the United States does not have a Free Trade Agreement ("Non-FTA countries") at the time such opportunities arise.

Power currently holds a long-term FTA export authorization issued under DOE/FE Order No. 4994 in Docket No. 23-11-LNG. This Application is intended to supersede and replace that authorization in its entirety. Power requests that DOE/HGEO, concurrently and simultaneously with the issuance of the long-term authorization requested herein, vacate Order No. 4994 (Docket

13 10 C.F.R. § 590.103(b) (2019); see also Freeport LNG Development, L.P., DOE/FE Order No. 2913 (Feb. 10, 2011) (establishing the framework under which an LNG exporter may act as agent for other LNG titleholders and must register each such titleholder with DOE/HGEO prior to export).

14 See, e.g., Freeport LNG Development, L.P., DOE/FE Order No. 2913 (2011) (granting long-term authorization to export LNG both on behalf of the applicant and as agent for other LNG title holders).

15 10 C.F.R. § 590.202(b) (2019) (requiring submission of "[a]ll relevant contracts and purchase agreements" and "[a]ll relevant natural gas supply agreements").

16 See, e.g., Blue Water Fuels, LLC, DOE/FE Order No. 4202 (2018) (permitting applicant to submit contracts within 30 days of execution where no contracts had been executed at the time of application).

17 Id. (finding that submission of contracts within 30 days of execution conforms to the requirement in 10 C.F.R. § 590.202(b) that such information be submitted "when practicable").

No. 23-11-LNG), such that the vacatur of the existing authorization and the effectiveness of the new authorization occur on the same date and at the same moment, with no gap in Power's export authorization and no period during which both the prior and new authorizations are simultaneously in effect. Upon such concurrent issuance and vacatur, Docket No. 23-11-LNG shall be administratively closed.

VII. EXPORT SOURCES

Power seeks authorization to export natural gas available from the Houston Pipeline System ("HPL System"). A subsidiary of Energy Transfer, the HPL System is an extensive network of intrastate natural gas pipelines, an underground Bammel storage reservoir, and related transportation assets. The system has access to multiple sources of historically significant natural gas supply reserves from South Texas, the Gulf Coast of Texas, East Texas, and the western Gulf of America, and is directly connected to major gas distribution, electric, and industrial load centers in Houston, Corpus Christi, Texas City, and other cities located along the Gulf Coast of Texas.

The HPL System is well situated to gather and transport gas in many of the major gas-producing areas in Texas, including a strong presence in the key Houston Ship Channel and Katy Hub markets. The HPL System also offers its shippers off-system opportunities due to its numerous interconnections with other pipeline systems, its direct access to multiple market hubs at Katy, the Houston Ship Channel, and Agua Dulce, and the Bammel storage facility. Through these interconnections, Power will have indirect access to the national natural gas pipeline system, providing Power and its potential customers with a variety of stable and economic natural gas supply options.

Power intends to enter into a long-term natural gas supply agreement with Energy Transfer for delivery of natural gas from the HPL System to our proposed liquefaction and export facility located at 1000 Seawolf Parkway, Galveston, Texas 77554, on Pelican Island within the Port of Galveston via pipeline interconnection consistent with final engineering and applicable pipeline tariff arrangements. Power will ensure that all natural gas feedstock utilized at the Facility for liquefaction and export is domestically produced and complies with all applicable DOE/HGEO requirements regarding export sources.

VIII. AUTHORIZED EXPORT VOLUME

A. Engineering and Technical Justification

Power requests authorization to export up to 51.75 Bcf of LNG per year. This requested volume reflects the full aggregate nameplate capacity of the Facility under its phased modular development plan, based on the designed configuration of multiple modular liquefaction trains, each with a nameplate capacity of approximately 13 Bcf per year, for a combined total of approximately 51.75 Bcf per year at full build-out.

Each modular train operates under the same optimized mixed refrigerant liquefaction cycle and standardized process configuration, ensuring operational consistency across all phases of development. Authorizing the full engineered capacity at this stage aligns DOE authorization with the maximum throughput of the modular configuration as currently designed, while preserving all DOE oversight and reporting authority under the existing regulatory framework.

IX. PUBLIC INTEREST

Pursuant to Section 3(c) of the NGA, Applications for authorization to export natural gas, including LNG, to nations with which the United States has in effect an FTA requiring national treatment for trade in natural gas are "deemed to be consistent with the public interest" and must be granted "without modification or delay."[18] In this Application, Power respectfully requests authorization to export LNG only to countries with which the United States has or in the future enters into an FTA requiring national treatment for trade in natural gas. This Application therefore falls within the scope of Section 3(c), and Power respectfully requests that DOE/HGEO promptly grant its request for authorization to export LNG to FTA countries consistent with this statutory presumption.

In addition, DOE's prior macroeconomic analyses have recognized that increased LNG exports can support domestic investment, job creation, and economic growth.[19] The requested authorization is consistent with those findings and with the statutory framework governing exports to FTA nations. Granting this authorization will support the development of a new domestic LNG production and export facility at the Port of Galveston, Texas, creating construction and permanent employment in the Galveston-Houston region and contributing to the federal and state tax base.

[18] 15 U.S.C. § 717b(c) (2018); 10 C.F.R. § 590.312 (2019) ("If the application for authorization to import or export natural gas involves a nation with which there is in effect a free trade agreement requiring national treatment for trade in natural gas, the authorization shall be granted without modification or delay.").

[19] U.S. Department of Energy, Macroeconomic Outcomes of Market Determined Levels of U.S. LNG Exports (June 2018); see also U.S. Department of Energy, Life Cycle Greenhouse Gas Perspective on Exporting Liquefied Natural Gas from the United States: 2019 Update (2019).

The adoption of a modular, factory-fabricated liquefaction configuration further serves the public interest by enabling Power LNG to bring initial export capacity to market more rapidly than a conventional stick-built facility, accelerating the availability of U.S. LNG supply to FTA trading partners. The modular approach also reduces the capital-intensive front-loading characteristic of large-scale liquefaction projects, making Power LNG's export program more financially resilient and commercially executable at a scale tailored to actual market demand. This demand-responsive development model is consistent with the objectives of U.S. energy export policy and supports the Administration's goal of expanding American LNG exports to allied and FTA nations.

X. ENVIRONMENTAL IMPACT

In addition to the authorization from DOE/HGEO sought in this Application, Power will seek all necessary permits from and consultations with other federal, state, and local agencies to ensure compliance with all applicable environmental laws and regulations. All equipment utilized at the Facility will meet applicable environmental performance standards established by governing regulatory authorities. Power will obtain all required environmental and maritime permits prior to commencement of construction and operation of the Facility.

Approval of this Application will not constitute a federal action significantly affecting the human environment within the meaning of NEPA, 42 U.S.C. § 4321 et seq.[20] The Facility will be designed, constructed, and operated in compliance with all applicable federal, state, and local environmental statutes and regulations, including but not limited to the following:

(i) Clean Air Act[21] permitting requirements applicable to LNG production and storage facilities, including applicable air emission controls and monitoring requirements;

(ii) Clean Water Act Section 402 (National Pollutant Discharge Elimination System ("NPDES")) and Section 404 permitting requirements[22] as applicable to construction and operation of the Facility and associated marine infrastructure;

(iii) Applicable coastal zone management requirements under the Coastal Zone Management Act,[23] including federal consistency determinations as required;

20 42 U.S.C. § 4321 et seq. (National Environmental Policy Act of 1969); 40 C.F.R. Parts 1500-1508 (Council on Environmental Quality regulations implementing NEPA).

21 42 U.S.C. § 7401 et seq. (Clean Air Act); 40 C.F.R. Parts 51, 52, 70, 71 (applicable air permitting regulations).

22 33 U.S.C. § 1342 (Clean Water Act, Section 402, National Pollutant Discharge Elimination System); 33 U.S.C. § 1344 (Clean Water Act, Section 404, Permits for Dredged or Fill Material); 40 C.F.R. Parts 122, 123 (NPDES regulations).

23 16 U.S.C. § 1451 et seq. (Coastal Zone Management Act of 1972); 15 C.F.R. Part 930 (Federal Consistency with Approved Coastal Management Programs).

(iv) U.S. Coast Guard maritime safety regulations applicable to LNG facilities and transfer operations,[24] including 33 C.F.R. Part 127 (Waterfront Facilities Handling LNG) and 33 C.F.R. Part 156 (transfer operations);

(v) PHMSA safety regulations under 49 C.F.R. Part 193 and NFPA 59A[25] applicable to LNG facility design, construction, and operations;

(vi) DOT hazardous materials regulations under 49 C.F.R. Parts 171, 173, and 178[26] applicable to the use and certification of ISO containers; and

(vii) Applicable state and local environmental, zoning, and land use approvals required by the State of Texas, Galveston County, and the City of Galveston, as applicable.

The modular liquefaction technology utilized at the Facility results in a smaller construction footprint at any given phase compared to a conventional onsite-built plant, as discrete factory-assembled units are installed incrementally. This phased construction footprint is expected to reduce near-term environmental disturbance during construction consistent with the Port of Galveston's industrial land use designations. Power will conduct all required environmental review and permitting processes prior to commencement of construction.

XI. APPENDICES

The following appendices are included with this Application:

Appendix A	Opinion of Counsel[27]
Appendix B	Verification[28]
Appendix C	Evidence of Site Control

XII. CONCLUSION

For the reasons set forth above, Power LNG LLC respectfully requests that DOE/HGEO issue an order granting Power long-term authorization to export up to approximately 51.75 billion cubic feet of LNG per annum of domestically produced natural gas in liquefied form, by DOT-approved ISO container via ocean-going carrier from its Facility at 1000 Seawolf Parkway, Galveston, Texas 77554, on Pelican Island within the Port of Galveston, Texas, to any country

24 33 C.F.R. Part 127 (Waterfront Facilities Handling Liquefied Natural Gas and Liquefied Hazardous Gas); 33 C.F.R. Part 156 (Operations in Navigable Waters and the Contiguous Zone).

25 NFPA 59A, Standard for the Production, Storage, and Handling of Liquefied Natural Gas (2023 ed.); 49 C.F.R. Part 193 (Pipeline Safety: Liquefied Natural Gas Facilities: Federal Safety Standards).

26 49 C.F.R. Parts 171, 173, and 178 (U.S. Department of Transportation Hazardous Materials Regulations); 49 C.F.R. § 173.318 (Cryogenic liquids in cargo tanks).

27 10 C.F.R. § 590.202(c) (2019) (requiring the applicant to submit "[a]n opinion of counsel that the proposed action is within the corporate or other powers of the applicant"); 10 C.F.R. § 590.202(d) (2019) (requiring the applicant to submit "[a] verified statement that the representations in the application are true and correct to the best of the representative's knowledge and belief").

28 10 C.F.R. § 590.202(d) (2019) (requiring the applicant to submit "[a] verified statement that the representations in the application are true and correct to the best of the representative's knowledge and belief").

with which the United States has, or in the future may have, an FTA requiring national treatment for trade in natural gas, for a long-term authorization for a period ending on December 31, 2050, with a three (3)-year make-up period through December 31, 2053. Power requests this authorization on its own behalf and as agent for other LNG titleholders.

As demonstrated herein, the requested authorization is consistent with the public interest and falls squarely within the scope of Section 3(c) of the NGA. The requested authorization should therefore be granted without modification or delay.

Respectfully submitted,

Dean M. Wallace, PMP
Power LNG LLC, Managing Partner / Co-Founder
26 Cmdr Runco Ln., Seabrook, Texas 77586
Tel: (240) 461-0201
Email: dean.wallace@power-lng.com

Appendix A -- Opinion of Counsel

PARKER LAW FIRM
1004 4th Street
League City, Texas 77573

STEVEN T. PARKER, P.C.

Telephone: (281) 795-7838
Email: steve@steveparkerlaw.com

May 20, 2026

Ms. Amy Sweeney
Office of Global Energy Security-Hydrocarbons and Geothermal Energy Office
U.S. Department of Energy
Docket Room 3F-056, FE-50
Forrestal Building
1000 Independence Avenue, S.W.
Washington, DC 20585

Re: **Power LNG LLC**
HGEO Docket No. 26-____-LNG
Application for Authorization to Export LNG to Free Trade Agreement Countries

Dear Ms. Sweeney:

This opinion of counsel is submitted pursuant to Section 590.202(c) of the regulations of the United States Department of Energy, 10 C.F.R. § 590.202(c)(2019), in connection with the application of Power LNG LLC ("Power") for long-term authorization to export Liquified Natural Gas to Free Trade Agreement countries. I am counsel to Power, a limited liability company formed under the laws of the State of Texas. I have reviewed and relied upon the organizational documents of Power, and it is my opinion that the proposed export of natural gas as described in the application filed by Power, to which this Opinion of Counsel is attached as Appendix "A", is within the company powers of Power LNG LLC.

Respectfully submitted,

By: ***/S/ STEVE PARKER***

Appendix B -- Verification

UNITED STATES OF AMERICA
BEFORE THE DEPARTMENT OF ENERGY
OFFICE OF GLOBAL ENERGY SECURITY - HYDROCARBONS AND GEOTHERMAL ENERGY OFFICE

In the Matter of	)	
	)	**HGEO Docket No. 26-_____-LNG**
POWER LNG LLC	)	

VERIFICATION

The undersigned, begin duly sworn, states that he is the authorized representative of Power LNG LLC; that he is duly authorized to make this Verification; that he has read the foregoing application and is familiar with the contents therein; that all the statements and matters contained therein are true and correct to the best of his information, knowledge, and belief; and that he is authorized to execute and file this application with the United States Department of Energy.

Dean M. Wallace, PMP
Managing Partner/Co-Founder
Power LNG LLC

Sworn to and subscribed to me on this 21st day of May 2026.

Tristan Day
Notary Public

For the State of Florida

TRISTAN DAY
Notary Public - State of Florida
Commission # HH 600102
My Comm. Expires Oct 3, 2028

Sworn to and subscribed before me by means of
☑ physical presence or ☐ online notarization,
this 21st day of May, 2026
By Dean M. Wallace
Signature of Notary Public

Tristan Day
Notary's Name, Printed, Stamped or Typed
Personally known ___ or Produced ID ✓
Type of ID Produced driver's license

Appendix C -- Evidence of Site Control

GALVESTON WHARVES
• 123 Rosenberg Avenue 8th Floor, Galveston, Texas 77550
• Galveston (409) 765-9321 • Houston (281) 286-2484
• Fax (409) 766-6171 • Website: http://www.portofgalveston.com

May 14, 2026

Mr. Dean M. Wallace, PMP
Power LNG LLC, Managing Partner/Co-Founder
26 Cmdr Runco Ln.
Seabrook, Texas 77586

Re: Confirmation of Exclusive Option and Site Control Rights – 1000 Seawolf Parkway, Galveston, Texas

Dear Mr. Wallace:

This correspondence confirms that Power LNG, LLC. has entered into an agreement with the Port of Galveston granting Power the exclusive right and option to negotiate, and subject to approval by the Port's Board of Trustees, enter into a long-term ground lease covering approximately thirty (30) acres of marine and industrial property located at 1000 Seawolf Parkway, Galveston, Texas 77554, on Pelican Island.

Pursuant to the terms of this agreement, the Port has provided Power LNG LLC with exclusive development rights during the option period with respect to the referenced property for purposes of evaluating, planning, and pursuing development of a liquefied natural gas facility and related infrastructure.

The parties intend that, upon satisfaction of agreed conditions — including authorization by the U.S. Department of Energy, Office of Global Energy Security - Hydrocarbons and Geothermal Energy Office (DOE/HGEO) of the export authorization — Power LNG LLC and the Port will negotiate and, following approval by the Port's Board of Trustees, execute a long-term ground lease consistent with the framework set forth in the option agreement.

This letter is provided as evidence of Power LNG LLC's exclusive option rights and site control status in support of its application for its long-term authorization to export liquefied natural gas to Free Trade Agreement countries.

Should additional information or documentation be required, please do not hesitate to contact the undersigned.

OPTIONOR

The Board of Trustees of the Galveston Wharves

By:_____
Rodger Rees
Port Director/CEO

By:_____
Anthony P. Brown
Legal Counsel to the Board of Trustees
Of the Galveston Wharves