

RECEIVED

By Docket Room at 8:04 am, May 01, 2026

KIRKLAND & ELLIS LLP

Andrew L. Stuyvenberg, P.C.
To Call Writer Directly:
+1 202 389 3015
drew.stuyvenberg@kirkland.com

1301 Pennsylvania Avenue, N.W.
Washington, D.C. 20004
United States

+1 202 389 5000

www.kirkland.com

Facsimile:
+1 202 389 5200

April 30, 2026

Via E-mail

Amy Sweeney
Director, Office of Global Energy Security
Hydrocarbons and Geothermal Energy Office
U.S. Department of Energy
1000 Independence Ave. S.W.
Washington, DC 20585

Re: Sapphire Gas Solutions
Docket No. 24-57-LNG
Statement and Notice of Change in Control

Dear Ms. Sweeney:

In accordance with the authorizations issued by the U.S. Department of Energy, Office of Fossil Energy and Carbon Management (“DOE/FECM”)¹ in the above-captioned proceeding and the *Procedures for Changes in Control Affecting Applications and Authorizations to Import or Export Natural Gas* (the “CIC Procedures”),² Sapphire Gas Solutions LLC (“Sapphire”) hereby respectfully submits the following statement and notice of change in control with respect to a change in Sapphire’s ownership.

Specifically, pursuant to a transaction that closed on April 1, 2026 (the “Transaction”), Oracle Aggregator LP indirectly acquired an approximately 97.6 percent interest in Sapphire. Consistent with the CIC Procedures, Sapphire respectfully requests DOE/HGEO give effect to the change in control resulting from the Transaction, as further described herein.

¹ On November 20, 2025, FECM changed its name to the Hydrocarbons and Geothermal Energy Office (HGEO). We use the acronym in effect at the time of each order or action discussed herein.

² *Procedures for Changes in Control Affecting Applications and Authorizations to Import or Export Natural Gas*, 79 Fed. Reg. 65,541 (Nov. 5, 2014).

KIRKLAND & ELLIS LLP

Amy Sweeney
April 30, 2026
Page 2

I. Background

Sapphire is authorized to export up to 51.75 billion cubic feet per year of LNG to both Free Trade Agreement (“FTA”) countries and non-FTA countries on a non-additive basis, for a term extending through December 31, 2050.³ Sapphire’s non-FTA authorization is a “small-scale natural gas export,” which by regulation is deemed to be consistent with public interest under Section 3(a) of the Natural Gas Act (“NGA”).⁴

As of the issuance of Sapphire’s Authorizations, Sapphire was a wholly owned indirect subsidiary of Apollo Global Management, Inc.⁵

II. Change in Control Procedures

Under DOE/HGEO regulations, an authorization to import or export natural gas (including LNG) may not be transferred or assigned unless authorized by the Assistant Secretary for Fossil Energy or the person to whom the Assistant Secretary further delegates such authority.⁶ With respect to transfers or assignments triggered by changes in control, DOE/FECM issued the CIC Procedures which govern how import or export authorization holders notify DOE/HGEO of certain changes in control.⁷ Pursuant to the CIC Procedures, “a rebuttable presumption that control exists will arise from the ownership or the power to vote, directly or indirectly, 10 percent or more of the voting securities of an entity.”⁸ Entities must file a notice of

³ *Sapphire Gas Solutions*, Order Granting Long-Term Authorization to Export Liquefied Natural Gas to Free Trade Agreement Nations, and Long-Term Authorization for Small-Scale Exports of Liquefied Natural Gas, DOE/FECM Order No. 5186, Docket No. 24-57-LNG (Oct. 21, 2024); *Sapphire Gas Solutions*, Order Amending Long-Term Authorization to Export Liquefied Natural Gas to Free Trade Agreement Nations and for Small-Scale Exports of Liquefied Natural Gas, DOE/FECM Order No. 5186-A, Docket No. 24-57-LNG (Jun. 9, 2025) (together, the “Authorizations”).

⁴ *See Authorizations*, at 5; 10 C.F.R. § 590.208(a) (“Small-scale natural gas exports are deemed to be consistent with the public interest under section 3(a) of the Natural Gas Act...”).

⁵ *See Authorizations*, at 4.

⁶ 10 C.F.R. §§ 590.102(a) and 590.405.

⁷ *CIC Procedures*, *supra* n.2.

⁸ *Id.* at 65,542.

KIRKLAND & ELLIS LLP

Amy Sweeney
April 30, 2026
Page 3

change in control to DOE/HGEO before or after the consummation of a change in control, but no later than 30 days after the change in control has been effectuated.⁹

Pursuant to the CIC Procedures, for FTA authorizations, DOE/HGEO will give immediate effect to the change in control upon receipt of the notice and take no further action. DOE/FECM has applied this same treatment to small-scale non-FTA authorizations, giving immediate effect to the change in control upon receipt of the notice without issuing a *Federal Register* notice or establishing an intervention period (as would be required by the CIC Procedures for a change in control of a non-FTA authorization).¹⁰

III. Description of the Transaction

Pursuant to the Transaction, Oracle Aggregator LP indirectly acquired an approximately 97.6 percent interest in Sapphire. The remaining ownership interests totaling approximately 2.4 percent are held by Sapphire management. Oracle Aggregator LP is wholly controlled by funds managed by Antin Infrastructure Partners SAS (“Antin”). Antin is wholly owned by Antin Infrastructure Partners S.A. (“Antin S.A.”) which is publicly traded on Euronext Paris. To the best of Sapphire’s knowledge, the only entities or individuals that hold 10 percent or more of the interest in Antin S.A. are Mr. Alain Rauscher and Mr. Mark Crosbie, the two founding partners of Antin S.A., and there are no other upstream affiliates of Antin S.A. Further, pursuant to the terms of the Transaction, the pre-Transaction management team of Sapphire continues to manage the day-to-day operations and activities of Sapphire.

IV. Statement and Notice of Change in Control

(a) FTA Export Authorization

As discussed above, the CIC Procedures provide that with respect to FTA Authorizations, upon receipt of a statement of change in control, DOE/HGEO shall give immediate effect to the change in control and take no further action.¹¹ Accordingly, with respect to Sapphire’s FTA

⁹ *Id.*

¹⁰ *Cryopeak Energy Solutions Corporation*, Order Responding to Notification of Change in Control and Granting Requests to Amend Authorization Holder, DOE/FECM Order No. 4865-B, Docket No. 22-63-LNG (Jun. 17, 2024) (“because qualifying small-scale exports of natural gas are ‘deemed to be consistent with the public interest’—as are FTA exports under NGA section 3(c)—we find good cause to apply the same Change in Control Procedures applicable to FTA export authorizations to small-scale export authorizations. Specifically, having received Cryopeak’s Notification, DOE ‘will give immediate effect to the change in control and take no further action.’”) (citations omitted).

¹¹ *CIC Procedures*, at 65,542.

KIRKLAND & ELLIS LLP

Amy Sweeney
April 30, 2026
Page 4

export authorization, Sapphire respectfully requests DOE/HGEO give immediate effect to the above-described change in control.

(b) Non-FTA Export Authorization

In prior proceedings, DOE/FECM has applied the same streamlined treatment afforded to FTA authorizations to small-scale non-FTA authorizations, giving immediate effect to the change in control upon receipt of the notice and taking no further action.¹² Accordingly, with respect to Sapphire's small scale non-FTA export authorization, Sapphire respectfully requests that DOE/HGEO give immediate effect to the above-described change in control.

V. Conclusion

Based on the foregoing, Sapphire respectfully requests that DOE/HGEO give effect to the change in control as described herein.

Respectfully submitted,

/s/ Andrew L. Stuyvenberg _____

Andrew L. Stuyvenberg
Kirkland & Ellis LLP
1301 Pennsylvania Avenue, NW
Washington, D.C. 20004
Tel: (202) 389-3015
drew.stuyvenberg@kirkland.com

Counsel for Antin Infrastructure Partners

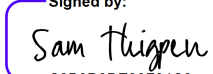
¹² *Cryopeak, supra* n.9.

VERIFICATION

I, Sam Thigpen, declare that I am the Chief Executive Officer of Sapphire Gas Solutions LLC and am duly authorized to make this verification; that I have read the foregoing instrument; and that the facts therein stated are true and correct to the best of my knowledge, information, and belief.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated this 30th day of April, 2026.

Signed by:

C9B0D0DE30F04E0...

Sam Thigpen
Chief Executive Officer
Sapphire Gas Solutions LLC
100 I-45 N, Ste. 500
Conroe, TX 77301
Tel: 833-622-5427
Email: sam@sapphirenatgas.com

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list in this proceeding.

Dated at Washington, D.C., this 30th day of April, 2026.

/s/ Drew Picard
KIRKLAND & ELLIS LLP
1301 Pennsylvania Avenue, N.W.
Washington, D.C. 20004
(202) 389-3569
drew.picard@kirkland.com

*Counsel for Antin Infrastructure
Partners*