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May 5, 2026

VIA EMAIL (FERGAS@HQ.DOE.GOV)

Ms. Amy Sweeney, Director
Office of Global Energy Security
Hydrocarbons and Geothermal Energy Office
EX-31
1000 Independence Avenue SW
Washington, DC 20585

**Re: Port Arthur LNG, LLC, Docket No. 26-____-LNG
Application for Blanket Authorization to Export Previously Imported LNG**

Dear Ms. Sweeney:

Port Arthur LNG, LLC submits herewith an application requesting a blanket authorization from the U.S. Department of Energy's Hydrocarbons and Geothermal Energy Office to export foreign-sourced liquefied natural gas previously imported into the United States for a two-year term commencing as early as practicable but no later than October 1, 2026. The following documents are included in support of the application:

Appendix A – Verification
Appendix B – Opinion of Counsel

Please contact the undersigned with any questions regarding this submission.

Respectfully submitted,

/s/ Brett A. Snyder

Brett A. Snyder
Counsel to Port Arthur LNG, LLC

cc: Jerrod L. Harrison
Ash Mayfield

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

Port Arthur LNG, LLC

)
) **Docket No. 26-____-LNG**
)

**APPLICATION OF PORT ARTHUR LNG, LLC
FOR BLANKET AUTHORIZATION
TO EXPORT PREVIOUSLY IMPORTED LIQUEFIED NATURAL GAS**

Pursuant to Section 3 of the Natural Gas Act (“NGA”)¹ and Part 590 of the United States Department of Energy (“DOE”) regulations,² Port Arthur LNG, LLC (“Port Arthur LNG”) respectfully submits this application (“Application”) for blanket authorization from DOE’s Hydrocarbons and Geothermal Energy Office (“DOE/HGEO”) to export up to a total of 20 billion cubic feet (“Bcf”), on a cumulative basis, of previously imported, foreign-sourced liquefied natural gas (“LNG”) from the Port Arthur LNG terminal in Jefferson County, Texas (“Port Arthur LNG Terminal”). Port Arthur LNG requests that the authorization allow it to export, on a short-term or spot-market basis and on its own behalf and as agent for other entities holding title to the LNG, to any country with the capacity to import LNG via ocean-going carrier and with which trade is not prohibited by U.S. law or policy. Port Arthur LNG requests this authorization for a two-year period commencing as early as practicable, but no later than October 1, 2026.

In support of this Application, Port Arthur LNG states as follows:

I. DESCRIPTION OF THE APPLICANT

The exact legal name of the applicant is Port Arthur LNG, LLC. Port Arthur LNG is a limited liability company organized under the laws of Delaware. Port Arthur LNG is a joint

¹ 15 U.S.C. § 717b.

² 10 C.F.R. Part 590.

venture owned by affiliates of Sempra, ConocoPhillips Company, KKR Pinnacle Investor L.P., and the Abu Dhabi Investment Authority. Port Arthur LNG’s principal place of business is 1500 Post Oak Boulevard, Suite 1000, Houston, Texas 77056.

II. COMMUNICATIONS AND CORRESPONDENCE

All communication about this Application should be directed to the following, who Port Arthur LNG certifies are the duly authorized representatives of Port Arthur LNG for purposes of this Application³:

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III. BACKGROUND

Port Arthur LNG is currently authorized to export domestically produced LNG from the Port Arthur LNG Terminal in Port Arthur, Texas, to countries with which the United States has a free trade agreement (“FTA”) requiring national treatment for trade in natural gas under DOE/FECM Order Nos. 3698, 3698-A, 3698-B, and 3698-C issued in Docket Nos. 15-53-LNG and 18-162-LNG (the “FTA Authorization”). Port Arthur LNG is also authorized to export LNG from the Port Arthur LNG Terminal to Non-FTA countries under DOE/FECM Order Nos. 4372,

³ 10 C.F.R. § 590.103(b).

4372-A, and 4372-B issued in Docket No. 15-96-LNG (the “Non-FTA Authorization”).⁴ Under these long-term authorizations, Port Arthur LNG is required to commence commercial operations by June 18, 2028.⁵ Prior to commencing commercial operations, Port Arthur LNG intends to use cooldown cargoes with imported, foreign-sourced LNG to pre-cool its liquefaction facilities during start-up.⁶ This start-up process does not consume LNG; it only uses cold LNG to absorb process heat. After the imported LNG completes the cooling process, Port Arthur LNG will “re-export” the LNG. Accordingly, Port Arthur LNG seeks authorization from DOE/HGEO to export the previously imported, foreign-sourced LNG used in its cooldown cargoes.

Port Arthur LNG plans to use the imported LNG to cool its liquefaction equipment during start-up, which will support efficient facility operation. First, Port Arthur LNG will use imported LNG to achieve the cooling. Next, Port Arthur LNG will store the LNG in existing storage tanks at the Port Arthur LNG Terminal. Port Arthur LNG will use existing infrastructure for this process, and no terminal or process modifications are necessary to facilitate Port Arthur LNG’s export request. Last, depending on market conditions, Port Arthur LNG will re-export the LNG to FTA or Non-FTA countries pursuant to the blanket authorization requested in this Application.

IV. REQUESTED AUTHORIZATION

Port Arthur LNG respectfully requests authorization to export up to 20 Bcf of previously imported, foreign-sourced LNG on a cumulative basis for a two-year term commencing as early

⁴ See *Port Arthur LNG, LLC*, DOE/FE Order No. 3698, FE Docket No. 15-53-LNG, Order Granting Long-Term Multi-Contract Authorization to Export Liquefied Natural Gas by Vessel from the Proposed Port Arthur LNG Project in Port Arthur, Texas, to Free Trade Agreement Nations (Aug. 20, 2015), *amended*, DOE/FE Order No. 3698-A, FE Docket Nos. 15-53-LNG & 18-162-LNG, Order Amending Long-Term, Multi-Contract Authorization to Export Liquefied Natural Gas By Vessel From the Proposed Port Arthur LNG Project in Port Arthur, Texas, to Free Trade Agreement Nations (Nov. 20, 2018); *Port Arthur LNG, LLC*, DOE/FE Order No. 4372, FE Docket No. 15-96-LNG, Opinion and Order Granting Long-Term Authorization to Export Liquefied Natural Gas to Non-Free Trade Agreement Nations (May 2, 2019).

⁵ See *Port Arthur LNG, LLC*, DOE/FECM Order Nos. 3698-C & 4372-B, Docket No. 15-53-LNG et al. (extending term to begin operations from Port Arthur LNG terminal to June 18, 2028).

⁶ Port Arthur LNG has separately filed an application for import authorization with DOE/HGEO under Docket No. 26-47-LNG.

as practicable, but no later than October 1, 2026. Port Arthur LNG requests authorization to export to any country with the capacity to import LNG via ocean-going carrier and with which trade is not prohibited by United States law or policy. Port Arthur LNG requests authorization to export on a short-term or spot-market basis and on its own behalf and as agent for other entities who will hold title to the LNG at the time of export. Port Arthur LNG will comply with all applicable procedures established by DOE/HGEO in prior proceedings.⁷

In this Application, Port Arthur LNG does not request authorization to export any domestically produced natural gas or LNG. The LNG that Port Arthur LNG is proposing to export is previously imported, foreign-sourced LNG derived from Port Arthur LNG's importing activities and is situated in LNG storage tanks at the Port Arthur LNG Terminal. No new construction or facility modifications are required for Port Arthur LNG to export foreign-sourced, imported LNG from the Port Arthur LNG Terminal.

V. THE REQUESTED AUTHORIZATION IS IN THE PUBLIC INTEREST

Section 3(c) of the NGA requires that applications for authorization to export natural gas, including LNG, to countries with which there is in effect an FTA requiring national treatment of trade in natural gas be deemed consistent with the public interest and granted without modification or delay.⁸ DOE/HGEO has found that, in light of its statutory obligation to grant such applications

⁷ Port Arthur LNG will comply with all applicable DOE/HGEO requirements for exporters and agents, including registration requirements, such as those established in DOE/FE Order No. 3698 at Ordering Para. (F) and Order No. 4372 at Ordering Para. (J). As such, Port Arthur LNG will, when acting as an agent, register with DOE/HGEO each LNG title holder for whom it seeks to export as an agent, and will provide DOE/HGEO with a written statement by the title holder acknowledging and agreeing to (i) comply with all requirements in Port Arthur LNG's export authorization; and (ii) include those requirements in any subsequent purchase or sale agreement entered into by the title holder. *See also Freeport LNG Expansion, L.P.*, DOE/FE Order No. 2913, FE 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).

⁸ 15 U.S.C. § 717b(c).

without delay or modification, there is no need for it to review factors affecting the public interest.⁹ Therefore, the FTA portion of this Application that falls within the scope of Section 3(c) of the NGA should be processed and approved in accordance with this standard.

As for the Non-FTA portion of this Application, DOE/HGEO must authorize exports of natural gas to Non-FTA nations unless it finds the exports “will not be consistent with the public interest” under Section 3(a) of the NGA.¹⁰ In applying this provision, DOE/HGEO has consistently found that Section 3(a) creates a rebuttable presumption that proposed exports of natural gas are in the public interest. The DOE/HGEO must grant a non-FTA export application unless opponents of the application make an affirmative showing based on evidence in the record that the export would be inconsistent with the public interest.¹¹

Although the NGA does not define “public interest,” DOE/HGEO has identified several factors that it considers when reviewing Non-FTA export applications, including economic impacts, international impacts, and security of natural gas supply.¹² In conducting its public interest review, DOE/HGEO is also guided by the 1984 Policy Guidelines¹³ and DOE Delegation

⁹ See, e.g., *Cameron LNG, LLC*, DOE/FE Order No. 3059, FE Docket No. 11-145-LNG, Order Granting Long-Term Multi-Contract Authorization to Export Liquefied Natural Gas By Vessel From the Cameron LNG Terminal to Free Trade Agreement Nations (Jan. 17, 2012); *Sabine Pass Liquefaction, LLC*, DOE/FE Order No. 2833, FE Docket No. 10-85-LNG, Order Granting Long-Term Authorization to Export Liquefied Natural Gas From Sabine Pass LNG Terminal to Free Trade Nations (Sept. 7, 2010).

¹⁰ 15 U.S.C. § 717b(a).

¹¹ See *Sierra Club v. DOE*, 867 F.3d 189, 203 (D.C. Cir. 2017).

¹² See, e.g., *Venture Global Plaquemines LNG, LLC*, DOE/FE Order No. 4446, FE Docket No. 16-28-LNG, Opinion and Order Granting Long-Term Authorization to Export Liquefied Natural Gas to Non-Free Trade Agreement Nations at 19 (Oct. 16, 2019) [hereinafter *Venture Global*]; *Eagle LNG Partners Jacksonville LLC*, DOE/FE Order No. 4445, FE Docket No. 16-15-LNG, Opinion and Order Granting Long-Term Authorization to Export Liquefied Natural Gas to Non-Free Trade Agreement Nations at 19 (Oct. 3, 2019) [hereinafter *Eagle LNG*]; *Gulf LNG Liquefaction Co., LLC*, DOE/FE Order No. 4410, FE Docket No. 12-101-LNG, Opinion and Order Granting Long-Term Authorization to Export Liquefied Natural Gas to Non-Free Trade Agreement Nations at 19-20 (July 31, 2019) [hereinafter *Gulf LNG*].

¹³ See *Policy Guidelines and Delegations Order Relating to Regulation of Imported Natural Gas*, 49 Fed. Reg. 6684 (Feb. 22, 1984). The goals of the 1984 Policy Guidelines are to “minimize federal control and involvement in energy markets and to promote a balanced and mixed energy resource system.” *Venture Global* at 19. The 1984 Policy Guidelines indicated that “[t]he federal government’s primary responsibility in authorizing imports [or exports] will be to evaluate the need for the gas and whether the import [or export] arrangement will provide the gas on a

Order No. 0204-111.¹⁴ While the Delegation Order is no longer in effect, DOE/HGEO continues to look to the following factors in its review of export applications: (i) the domestic need for the natural gas to be exported; (ii) whether the proposed exports pose a threat to the security of domestic natural gas supplies; (iii) whether the arrangement is consistent with DOE/HGEO's policy of promoting market competition; and (iv) any other factors bearing on the public interest.¹⁵

In recent orders, DOE/HGEO noted that it has issued numerous blanket authorizations to export previously imported LNG.¹⁶ DOE/HGEO indicated that these authorizations “were based, in part, on authoritative data indicating that United States consumers have access to substantial quantities of natural gas sufficient to meet domestic demand from other competitively-priced sources.”¹⁷ In these orders, DOE/HGEO has taken administrative notice of the U.S. Energy Information Administration's (“EIA”) *Annual Energy Outlook*, which has projected annual domestic dry natural gas production to exceed total natural gas consumption in 2026 and 2027.¹⁸ DOE/HGEO concluded that because “domestic natural gas production levels are projected to reach an amount that well exceeds the amount of natural gas proposed for short-term export in [the] Application, we find that United States consumers will continue to have access to substantial

competitively priced basis for the duration of the contract while minimizing regulatory impediments to a freely operating market.” 49 Fed. Reg. at 6685. DOE/FE has explained that while the 1984 Policy Guidelines are nominally applicable to natural gas import cases, they are applicable to export applications. *See, e.g., Venture Global* at 20.

¹⁴ U.S. Department of Energy, Delegation Order No. 0204-111 (Feb. 22, 1984). Delegation Order No. 0204-111 based the regulation of exports “on a consideration of the domestic need for the gas to be exported and such other matters [found] in the circumstances of a particular case to be appropriate.” *Id.* at 1.

¹⁵ *See, e.g., Venture Global* at 20; *Eagle LNG* at 20; *Gulf LNG* at 21.

¹⁶ *Golden Pass LNG Terminal LLC*, DOE/FECM Order No. 5340, Docket No. 25-81-LNG, Order Granting Blanket Authorization to Export Liquefied Natural Gas Previously Imported from Foreign Sources to Free Trade Agreement and Non-Free Trade Agreement Nations at 10 (Sept. 22, 2025) [hereinafter *Golden Pass*]; *Southern LNG Company, L.L.C.*, DOE/FECM Order No. 5269, Docket No. 25-19-LNG, Order Granting Blanket Authorization to Export Liquefied Natural Gas Previously Imported from Foreign Sources to Free Trade Agreements and Non-Free Trade Agreement Nations at 9 (Mar. 28, 2025) [hereinafter *Southern*].

¹⁷ *Id.*

¹⁸ *Golden Pass* at 10.

quantities of natural gas sufficient to meet domestic demand from multiple other sources at competitive prices without drawing on the LNG that [applicant] seeks to export.”¹⁹

In approving Port Arthur LNG’s existing long-term Non-FTA Authorization, DOE/HGEO conducted an extensive public interest review of exports from the Port Arthur LNG Terminal, including an evaluation of domestic need for the natural gas proposed for export. Based on these reviews, DOE/HGEO already determined the proposed exports were not shown to be inconsistent with the public interest.²⁰ Likewise, the re-exports proposed in this Application are not inconsistent with the public interest. The natural gas that Port Arthur LNG seeks to export under this Application would be previously imported LNG, and thus would have no adverse impact on the domestic supply or price of natural gas. Likewise, foreign-sourced gas is not necessary to meet domestic demands, so the proposed re-exports will not impact domestic policy objectives. As such, the proposed re-exports are consistent with the public interest, and meet the criteria established by the NGA and DOE.

VI. COMPLIANCE WITH THE NATIONAL ENVIRONMENTAL POLICY ACT

As mentioned above, Port Arthur LNG is currently authorized by DOE/HGEO to export domestically produced LNG to various international sources by vessel. As the lead agency for compliance with the National Environmental Policy Act (“NEPA”),²¹ FERC issued a final Environmental Impact Statement (“EIS”) for Port Arthur LNG’s liquefaction project on January 31, 2019.²² DOE/HGEO participated as a cooperating agency in FERC’s environmental review and adopted FERC’s final environmental impact statement in issuing DOE/FE Order No. 4372,

¹⁹ *Golden Pass* at 10; *Southern* at 9.

²⁰ See DOE/FE Order No. 4372 at 78-79.

²¹ 42 U.S.C. § 4321 *et seq.*

²² *Port Arthur LNG, LLC*, Final Environmental Impact Statement, FERC Docket No. CP17-20-000 *et al.* (Jan. 31, 2019).

authorizing Port Arthur LNG's long-term, multi-contract exports to Non-FTA countries.²³ No construction, operational changes, or other modifications are required to the Port Arthur LNG Terminal to allow the re-export of gas described in this Application.

In addition, this Application qualifies for a B5.7 categorical exclusion pursuant to 10 C.F.R. Part 1021, Subpart D, Appendix B, pursuant to which neither an environmental impact statement nor an environmental assessment is required.²⁴ Port Arthur LNG therefore respectfully requests that DOE/HGEO find that Port Arthur LNG's proposed exports are categorically excluded from further review under NEPA.

VII. APPENDICES

The following appendices are included with this Application.

Appendix A Verification

Appendix B Opinion of Counsel

VIII. CONCLUSION

For the reasons described in this Application, Port Arthur LNG respectfully requests that DOE/HGEO grant its request for a short-term, blanket authorization to engage in exports of foreign-sourced gas up to 20 Bcf, on a cumulative basis, to any country with the capacity to import LNG via ocean-going carrier and with which trade is not prohibited by U.S. law or policy, for a term of two years, commencing as early as practicable, but no later than October 1, 2026.

²³ See DOE/FE Order No. 4372 at 5, 33, 55.

²⁴ Item B5.7 applies to “[a]pprovals or disapprovals of new authorizations or amendments of existing authorizations to export natural gas under section 3 of the Natural Gas and any associated transportation of natural gas by marine vessel.” 10 C.F.R. Part 1021, App. B, Item B5.7.

Respectfully submitted,

/s/ Brett A. Snyder

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Counsel to Port Arthur LNG, LLC

Dated: May 5, 2026

Appendix A: Verification

VERIFICATION

I, William G. Gurrola, declare that I am Vice President & General Manager, Port Arthur LNG, LLC, and am duly authorized to make this Verification; that I have read the foregoing Application 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.

Executed in Houston, Texas, on April 28, 2026.

/s/



William G. Gurrola
Vice President & General Manager
Port Arthur LNG, LLC

Appendix B: Opinion of Counsel

May 5, 2026

Ms. Amy Sweeney, Director
Office of Global Energy Security
Hydrocarbons and Geothermal Energy Office
EX-31
1000 Independence Avenue SW
Washington, DC 20585

Re: Port Arthur LNG, LLC, Docket No. 26-____-LNG
Application for Blanket Authorization to Export Previously Imported LNG

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 (“DOE”), 10 C.F.R. § 590.202(c) (2026). I am counsel to Port Arthur LNG, LLC (“Port Arthur LNG”).

I have reviewed the organizational and internal governance documents of Port Arthur LNG and it is my opinion that the Application for Blanket Authorization to Export Previously Imported LNG filed by Port Arthur LNG with the DOE Hydrocarbons and Geothermal Energy Office on May 5, 2026 is within the company powers of Port Arthur LNG.

Respectfully submitted,

/s/ Jerrod L. Harrison _____

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On Behalf of Port Arthur LNG, LLC