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

In the Matter of

SUSTAIN ENERGY LLC
HGEO Docket No. _____

**APPLICATION OF SUSTAIN ENERGY LLC FOR LONG-TERM,
MULTI-CONTRACT AUTHORIZATION TO EXPORT
LIQUEFIED NATURAL GAS TO FREE TRADE AGREEMENT
AND NON-FREE TRADE AGREEMENT NATIONS**

Clement Neige
Founder & Manager
Sustain Energy LLC
3515 W Dallas St, Suite 6224
Houston, TX 77019
(713) 240-9935
commercial@sustaintransports.com

Kevin P. Walters
Royston, Rayzor, Vickery & Williams, L.L.P.
1415 Louisiana, Suite 4200
Houston, Texas 77002
(713) 890-3223
kevin.walters@roystonlaw.com
Counsel for Sustain Energy LLC

Filed: April 27, 2026

I. INTRODUCTION

Pursuant to Section 3 of the Natural Gas Act ("NGA")¹ and Part 590 of the Department of Energy ("DOE") regulations,² SUSTAIN ENERGY LLC ("Sustain" or "Applicant") hereby files this Application with the Hydrocarbons and Geothermal Energy Office of the DOE ("DOE/HGEO") for long-term and short-term authorization to export domestically produced liquefied natural gas ("LNG").³

Specifically, Sustain requests authorization to export LNG of up to the equivalent of 51.75 billion cubic feet ("Bcf") of natural gas per year to any country with which the United States either (1) has a Free Trade Agreement ("FTA") requiring national treatment for trade in natural gas or (2) does not have such an FTA but with which trade is not prohibited by United States law or policy ("non-FTA" nations).⁴

With respect to exports to non-FTA nations, this Application is submitted under DOE's rule expediting the application and approval process for "small-scale" natural gas exports.⁵ Sustain requests this export authorization for use on behalf of itself when it owns the LNG and as agent for other entities that would hold title to the LNG at the time of export, for a period extending through December 31, 2050, consistent with DOE policy.

Sustain is filing this Application in conjunction with its plan to export small quantities of LNG in ISO containers to various countries, including but not limited to, the Caribbean, Central America, and South America.⁶ Sustain primarily plans to (i) source LNG from the small-scale liquefaction and peaking facilities listed in Appendix C; (ii) transport the LNG in DOT-approved ISO containers by truck from such facilities to existing U.S. marine terminals; (iii) load the ISO containers onto ocean-going container vessels for international transport; and (iv) export the LNG to end-users in emerging markets. Sustain will comply with DOE's established reporting requirements, including with respect to destinations.

Sustain would export domestically-produced LNG received from existing facilities within the United States. Sustain expects that these LNG suppliers will acquire natural gas from supply produced throughout the United States and delivered to the relevant facilities through the integrated natural gas pipeline grid.

Numerous facilities around the country currently sell LNG on a commercial basis which potentially could be exported by Sustain. To provide Sustain maximum flexibility to meet the needs of its customers, Sustain includes in Appendix C a list of all facilities from which it may obtain LNG for export. To the extent Sustain seeks to export LNG from facilities that are not listed in Appendix C, Sustain will file to amend its application to include such facilities.

¹ 15 U.S.C. § 717b.

² 10 C.F.R. Part 590.

³ DOE/HGEO issued a Policy Statement on December 18, 2020, discontinuing its practice of issuing separate long-term and short-term authorizations for exports of natural gas from the same facility. Policy Statement, 86 Fed. Reg. 2243 (Jan. 12, 2021). Accordingly, Sustain requests that its long-term authorization also allow for LNG exports on a short-term or spot basis.

⁴ The U.S. 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.

⁵ 10 C.F.R. § 590.208(a) (2023); Small-Scale Natural Gas Exports, Final Rule, 83 Fed. Reg. 35106 (July 25, 2018).

⁶ Sustain intends to utilize ISO containers that have been specified as ASME tanks and approved by the Department of Transportation for transporting LNG.

II. DESCRIPTION OF THE APPLICANT

The exact legal name of the applicant is SUSTAIN ENERGY LLC. Sustain is a limited liability company organized and existing under the laws of the State of Texas, with its principal place of business located at 3515 W Dallas St, Suite 6224, Houston, Texas 77019.

Sustain was founded by Clement Neige, who serves as Founder and Manager of the company. Sustain is a privately held energy trading company engaged in the sourcing, marketing, and logistics of liquefied natural gas. The company is authorized under its governing documents to engage in the export and trading of LNG. Sustain does not currently hold any DOE natural gas export authorizations.

III. COMMUNICATIONS AND CORRESPONDENCE

All communications regarding this Application, including service of all pleadings and notices, should be directed to:

Clement Neige
Founder & Manager
Sustain Energy LLC
3515 W Dallas St, Suite 6224
Houston, TX 77019
(713) 240-9935
commercial@sustaintransports.com

Kevin P. Walters
Royston, Rayzor, Vickery & Williams, L.L.P.
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Houston, Texas 77002
(713) 890-3223
kevin.walters@roystonlaw.com
Counsel for Sustain Energy LLC

IV. AUTHORIZATION REQUESTED

A. Export Authorization.

Sustain requests authorization to export LNG of up to the equivalent of 51.75 Bcf of domestic natural gas per year to both FTA and non-FTA nations, for a term extending through December 31, 2050. Sustain expects that its LNG exports will primarily be short-term (less than two years duration) transactions, but Sustain seeks here long-term export authorization to provide it the flexibility to enter into both short-term and long-term arrangements, consistent with DOE's policy.⁷ Sustain requests that its export authorization commence effective upon the issuance of the authorizing order.

B. Agency Authorization.

Sustain may contract with third-party sellers and distributors to purchase LNG for export. Therefore, Sustain requests export authority on behalf of itself and as agent for other title holders of LNG. DOE has consistently granted this type of agency authority in similar small-scale export applications.

Sustain commits that it will comply with all requirements imposed by DOE/HGEO on Sustain as an exporter and agent, including that Sustain will: (a) register each LNG title holder for whom Sustain seeks to export as agent, with such registration including a written statement by the LNG title holder acknowledging and agreeing to comply with all applicable requirements; and (b) file under seal with DOE/HGEO any relevant long-term commercial agreements once they have been executed, consistent with DOE/HGEO's established policy.

⁷ DOE/HGEO issued a Policy Statement on December 18, 2020, consolidating short-term and long-term export authority in a single authorization. Policy Statement, 86 Fed. Reg. 2243 (Jan. 12, 2021).

V. CONSISTENCY WITH THE PUBLIC INTEREST

Section 3(c) of the NGA, as amended by § 201 of the Energy Policy Act of 1992, requires that applications to authorize exports of natural gas, including LNG, to nations with which there is in effect a FTA requiring national treatment for trade of natural gas be "deemed to be consistent with the public interest" and "granted without modification or delay."⁸ Accordingly, the portion of this Application requesting authorization for Sustain to export LNG to FTA countries should be granted without modification or delay, consistent with the statute and DOE/HGEO's established practice.

With respect to exports to non-FTA nations, DOE determined by rule that "small-scale" natural gas exports are consistent with the public interest as required for authorization under NGA Section 3(a). Pursuant to the rule and its implementing regulations, small-scale natural gas exports are exports of natural gas, including LNG, that meet two criteria: (1) the quantity to be exported is 51.75 Bcf per year or less; and (2) DOE's authorization of the exports does not require the preparation of an environmental impact statement or environmental assessment under the National Environmental Policy Act ("NEPA") of 1969 (42 U.S.C. 4321, et seq.).⁹

Sustain requests authorization here of exports up to the volumetric limit established in the Small Scale Exports Rule. With respect to NEPA, DOE has established a categorical exclusion for the export of natural gas and associated transportation by marine vessel.¹⁰ Sustain will export LNG produced at existing facilities and transport in ISO containers to commercial ports where it will be loaded using existing facilities onto ocean-going carriers, consistent with the scope of this categorical exclusion from NEPA. No construction will be required in connection with this authorization. Thus, DOE approval of Sustain's request does not require the preparation of an environmental impact statement or environmental assessment. Therefore, in accordance with the Small Scale Exports Rule, the authorization for exports to non-FTA nations requested by Sustain is consistent with the public interest and should be granted by DOE.

Sustain respectfully requests that DOE grant the long-term export authorizations requested in this Application on an expedited basis consistent with its treatment of similar "small-scale" export applications. At this time, Sustain has not yet entered into any contracts associated with the export of LNG, but it will file, or cause to be filed, any such long-term contracts entered into in the future within 30 days after execution in accordance with established DOE policies.

⁸ 15 U.S.C. § 717b(c).

⁹ 10 C.F.R. § 590.102(p); Small Scale Exports Rule 83 Fed. Reg. at 35113-15.

¹⁰ 10 C.F.R. Part 1021, subpart D, appendix B5.7.

VI. APPENDICES

The following appendices are attached to this Application:

Appendix A: Verification

Appendix B: Opinion of Counsel

Appendix C: List of Potential LNG Sources

Appendix D: Corporate Information

VII. CONCLUSION

Based on the reasons set forth above, Sustain Energy LLC respectfully requests that DOE/HGEO expeditiously issue the requested long-term multi-contract authority to export LNG produced from domestic natural gas sources at the LNG facilities specifically identified in Appendix C, in quantities of up to the equivalent of 51.75 Bcf of natural gas per year to both FTA and non-FTA nations, for a term extending through December 31, 2050.

Respectfully submitted,



Clement Neige
Founder & Manager
Sustain Energy LLC

Dated: April 27th, 2026

APPENDIX A

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

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VERIFICATION

The undersigned, being duly authorized, on oath states that he is the Founder and Manager of SUSTAIN ENERGY LLC; that he has read the foregoing Application and that all the statements and matters contained therein are true and correct to the best of his information, knowledge 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 27th, 2026.



Clement Neige
Founder & Manager
SUSTAIN ENERGY LLC

May 1, 2026

OPINION OF COUNSEL

Re: Department of Energy LNG Export Application – Sustain Energy LLC
Our File: 68499

To Whom It May Concern:

This opinion is submitted pursuant to 10 C.F.R. § 590.202(c) of the Department of Energy administrative procedures, in connection with the Application of SUSTAIN ENERGY LLC for long-term authorization to export liquefied natural gas under Section 3 of the Natural Gas Act.

The undersigned is counsel to SUSTAIN ENERGY LLC, a limited liability company organized under the laws of the State of Texas. I have reviewed the Company's Certificate of Formation and other relevant corporate documents.

Based upon the foregoing, it is my opinion that:

1. SUSTAIN ENERGY LLC is duly organized, validly existing, and in good standing under the laws of the State of Texas;
2. SUSTAIN ENERGY LLC has the corporate power and authority to engage in the export of liquefied natural gas as described in the Application; and
3. The execution and filing of the Application has been duly authorized.

Respectfully submitted,

ROYSTON, RAYZOR, VICKERY & WILLIAMS, L.L.P.

By: /s/ Kevin P. Walters

Kevin P. Walters

KPW/BEB

APPENDIX C

UNITED STATES OF AMERICA
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LIST OF POTENTIAL LNG SOURCES

The following facilities are existing, operational LNG production and peak-shaving facilities located within the United States. A description of each facility based on publicly available information is provided. The following facilities have not been licensed by FERC. Sustain Energy LLC will notify DOE/HGEO of any additional facilities from which it will source LNG for export and will amend this Appendix C accordingly.

1. **JAX LNG Facility (Jacksonville (Dames Point), FL).** Located on the St. Johns River, jointly owned by subsidiaries of Southern Company Gas and North Star Midstream, LLC. The facility has a liquefaction capacity of approximately 360,000 gallons of LNG per day and storage of over 4 million gallons. JAX LNG has both marine and truck-loading capabilities. Port: Jacksonville, Florida.
2. **Eagle LNG Partners (Maxville Facility) (Jacksonville, FL).** A natural gas liquefaction plant near Jacksonville with a capacity of approximately 187,000 gallons per day and 1 million gallons of storage. The facility is designed specifically to load LNG ISO containers for transport to nearby island markets. Eagle LNG is also building a fuel depot dockside at the Talleyrand Marine Terminal on the St. Johns River. Port: Jacksonville, Florida.
3. **Sawgrass LNG Facility (Miami LNG) (Hialeah, FL).** A small-scale liquefaction facility with approximately 100,000 gallons per day of production capacity and 270,000 gallons of permanent on-site storage. The facility is capable of loading LNG ISO containers for transport to Port Everglades by truck. Port: Port Everglades, Florida.
4. **Puget LNG Facility (Tacoma, WA).** Located on the Blair Waterway on Puget Sound, wholly owned by Puget Energy. Production capacity of approximately 225,000 gallons per day with over 1.7 million gallons of storage. Provides both marine and truck-loading capabilities. Port: Tacoma, Washington.
5. **Clean Energy Fuels, Pickens Plant (Willis, TX).** A small-volume LNG production facility owned and operated by Clean Energy Fuels Corporation. Liquefaction capacity of approximately 100,000 gallons per day and storage capacity of 1 million gallons. Capable of loading twelve trucks per day. Port: Port of Houston or Port of Galveston, Texas.
6. **Alkane Midstream, Seminole Plant (Seminole, TX).** A small-volume LNG production facility owned and operated by Alkane Midstream, using pipeline gas. Production capacity of 60,000 gallons per day, expandable to 100,000 gallons per day, with 60,000 gallons of permanent storage. Port: Port of Houston or Port of Galveston, Texas.

7. **Pivotal LNG, Trussville Plant (Trussville, AL).** Owned and operated by Pivotal LNG, a wholly-owned subsidiary of Berkshire Hathaway Energy Gas Transmission and Storage. Storage capacity of 4.8 million gallons and production of approximately 60,000 gallons per day. Features two truck scales and three loading racks. Port: Port of Mobile, Alabama.
8. **Kinetrex Energy (LNG North & South Plants) (Indianapolis, IN).** Wholly-owned subsidiary of Kinder Morgan. Two LNG facilities each with 1 Bcf of storage capacity, producing approximately 125,000 gallons of LNG per day each, with two loading stations capable of fueling 48 loads of LNG daily. Port: Multiple Midwest and Gulf access points.
9. **Frontier Natural Resources, Mansfield Plant (Mansfield, PA).** Small-scale LNG facility producing approximately 6,000 gallons of LNG per day from stranded natural gas assets, stored on site for transfer to cryo-tankers. Port: Northeast U.S. marine terminals.
10. **Frontier Natural Resources, Clearfield Plant (Clearfield, PA).** Small-scale LNG facility producing approximately 36,000 gallons of LNG per day from stranded natural gas assets, stored on site for transfer to cryo-tankers. Port: Northeast U.S. marine terminals.
11. **Spire Energy, Coosada LNG Facility (Alabama).** 80 MMCF total capacity. LNG source: Liquefaction. Port: Port of Mobile, Alabama.
12. **Spire Energy, Pinson LNG Facility (Alabama).** 120 MMCF total capacity. LNG source: Liquefaction. Port: Port of Mobile, Alabama.
13. **Spire Energy, East Lauderdale LNG Facility (Alabama).** 2.988 MMCF total capacity. LNG source: Truck. Port: Port of Mobile, Alabama.
14. **Spire Energy, Double Springs LNG Facility (Alabama).** 0.768 MMCF total capacity. LNG source: Truck. Port: Port of Mobile, Alabama.
15. **Atlanta Gas Light Co., Cherokee LNG Facility (Georgia).** 624 MMCF total capacity. LNG source: Liquefaction. Port: Port of Savannah, Georgia.
16. **Atlanta Gas Light Co., Macon LNG Facility (Georgia).** 150 MMCF total capacity. LNG source: Liquefaction. Port: Port of Savannah, Georgia.
17. **Atlanta Gas Light Co., Riverdale LNG Facility (Georgia).** 400 MMCF total capacity. LNG source: Liquefaction. Port: Port of Savannah, Georgia.

APPENDIX D

UNITED STATES OF AMERICA
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CORPORATE INFORMATION

Legal Name: Sustain Energy LLC

State of Organization: Texas

Date of Formation: August 12, 2024

Texas SOS File Number: 0805659057

Principal Place of Business:

3515 W Dallas St, Suite 6224
Houston, TX 77019

Registered Agent:

Clement Neige
3515 W Dallas St, Suite 6224
Houston, TX 77019

Ownership Structure:

Sustain Energy LLC is wholly owned by Clement Neige (Individual), with 100% ownership. No other entity holds a direct or indirect ownership interest exceeding 10%. The Applicant is not owned or controlled by any foreign government entity.

Compliance Commitments:

Sustain Energy LLC agrees that all exports authorized by DOE shall comply with U.S. laws and policies, including OFAC regulations, reporting obligations under Form FE-746R, and all other applicable requirements. Sustain will file executed long-term contracts within 30 days of execution and will register all agency relationships with DOE/HGEO as required.