

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

IN THE MATTER OF:

Corpus Christi Liquefaction, LLC

Corpus Christi Liquefaction Stage IV, LLC

Cheniere Marketing, LLC

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Docket No. 26-32-LNG

ANSWER IN OPPOSITION TO MOTION FOR LEAVE

Pursuant to Section 590.302(b) of the United States Department of Energy’s (“DOE”) regulations,¹ Corpus Christi Liquefaction, LLC, Corpus Christi Liquefaction Stage IV, LLC and Cheniere Marketing, LLC (collectively, “Applicants”) hereby submit the instant answer (“Answer to Motion”) in opposition to the Motion for Leave and Answer filed by Ingleside on the Bay Coastal Watch Association, Inc., Indigenous Peoples of the Coastal Bend, the Karankawa Tribe of Texas, and the Carrizo/Comecrudo Tribe of Texas, LLC (collectively, “Movants”) with DOE’s Hydrocarbons and Geothermal Energy Office on July 15, 2026 (the “Motion for Leave” and “Answer to Answer”, respectively)² in the above-captioned proceeding. As explained below, Applicants respectfully request that DOE deny Movants’ Motion for Leave and strike the Answer to Answer from the record.

In support of the instant Answer to Motion, Applicants state the following:

¹ 10 C.F.R. § 590.302(b) (2025).

² *Corpus Christi Liquefaction, LLC, Corpus Christi Liquefaction Stage IV, LLC & Cheniere Marketing, LLC, Motion for Leave and Answer of Ingleside on the Bay Coastal Watch Association, Inc., Indigenous Peoples of the Coastal Bend, the Karankawa Tribe of Texas, and the Carrizo/Comecrudo Tribe of Texas, LLC, Docket No. 26-32-LNG (July 15, 2026).*

I. **BACKGROUND**

On March 19, 2026, pursuant to Section 3 of the Natural Gas Act,³ Applicants filed an application with DOE (“Application”)⁴ seeking long-term, multi-contract authorization to export domestically produced liquefied natural gas (“LNG”) in a volume equivalent to approximately 1,200 billion cubic feet of natural gas per year from the proposed “CCL Stage 4 Project,”⁵ an expansion of the existing and approved LNG terminal on the La Quinta Ship Channel in San Patricio and Nueces Counties, Texas (“CCL Terminal”).⁶

DOE published notice of the Application in the Federal Register on April 15, 2026, requiring that protests, motions to intervene, or notices of intervention, as applicable, and written comments be filed by June 15, 2026.⁷ On June 15, 2026, Movants filed a motion to intervene and protest (“Protest”), which raised a number of issues and contained numerous instances of factually and legally inaccurate information.⁸ On June 30, 2026, Applicants filed an answer to the Protest (“Answer to Protest”) to respond to Movants’ allegations and correct the record before DOE.⁹ On

³ 15 U.S.C. § 717b.

⁴ *Corpus Christi Liquefaction, LLC, Corpus Christi Liquefaction Stage IV, LLC & Cheniere Marketing, LLC*, Application for Long-Term Authorization to Export Liquefied Natural Gas to Free Trade Agreement Nations and Non-Free Trade Agreement Nations, Docket No. 26-32-LNG (Mar. 19, 2026).

⁵ The proposed CCL Stage 4 Project includes the addition of four liquefaction trains, two LNG storage tanks, three ground flares, a third marine berth, a terminal supply line, and other associated infrastructure.

⁶ CCL Terminal means all existing facilities at the LNG terminal and all authorized but not yet constructed facilities approved in Federal Energy Regulatory Commission Docket Nos. CP12-507-000, as amended in CP19-514-000; CP18-512-000; and CP23-129-000.

⁷ *Corpus Christi Liquefaction, LLC; Corpus Christi Liquefaction Stage IV, LLC; and Cheniere Marketing, LLC*; Application for Long-Term Authorization to Export Liquefied Natural Gas to Non-Free Trade Agreement Nations, 91 Fed. Reg. 20,157 (Apr. 15, 2026) (“Notice of Application”).

⁸ *Corpus Christi Liquefaction, LLC, Corpus Christi Liquefaction Stage IV, LLC & Cheniere Marketing, LLC*, Motion to Intervene and Protest of Ingleside on the Bay Coastal Watch Association, Inc., Indigenous Peoples of the Coastal Bend, Karankawa Tribe of Texas, and Carrizo/Comecrudo Tribe of Texas, LLC, Docket No. 26-32-LNG (June 15, 2026).

⁹ *Corpus Christi Liquefaction, LLC, Corpus Christi Liquefaction Stage IV, LLC & Cheniere Marketing, LLC*, Answer in Opposition to Protest, Docket No. 26-32-LNG (June 30, 2026).

July 15, 2026, having recognized the legal deficiencies in the Protest, as flagged by Applicants, Movants filed the Answer to Answer,¹⁰ which seeks to impermissibly supplement the Protest out of time and introduce new issues and information. As DOE’s regulations do not provide for answers to answers, Applicants are herein only responding to Movants’ Motion for Leave and do not address the substantive issues raised in the Answer to Answer.¹¹ As explained below, DOE should deny Movants’ Motion for Leave and strike the Answer to Answer from the record.

II.

ANSWER TO MOTION

At the outset, Applicants note that DOE’s regulations provide parties to a proceeding with the opportunity to file answers in response to motions, interventions, and protests,¹² but do not provide for parties to file answers to answers.¹³ Although DOE has previously granted a party’s motion for leave to answer when it is relevant to DOE’s consideration of issues raised by an opposing party, for example in the context of requests for rehearing, Movants here expressly concede they seek only to provide additional information relevant to ***their own Protest***.¹⁴

DOE should not countenance Movants’ impermissible second chance effort to further bolster the arguments in their Protest, including recasting one of their legal arguments which was

¹⁰ *Supra* n.2.

¹¹ Should DOE grant Movants’ Motion for Leave, the Applicants expressly reserve the right to provide a responsive answer to the new allegations and issues raised in the Answer to Answer.

¹² See 10 C.F.R. §§ 590.302-304.

¹³ See generally 10 C.F.R. Part 590.

¹⁴ Compare *Answer to Answer*, at 2 (“This proposed Answer is relevant to DOE’s consideration of issues raised in [Movants’] DOE Protest.”), with *Alaska LNG Project LLC*, Order on Rehearing, DOE/FE Order No. 3643-B, FE Docket No. 14-96-LNG, at 11 (Apr. 15, 2021) (granting Alaska Gasline Development Corporation’s motion for leave to answer because its answer was “relevant to [DOE’s] consideration of the issues raised in Sierra Club’s Rehearing Request.”), *Magnolia LNG, LLC*, Opinion and Order Granting Motion for Leave to Answer Request for Rehearing and Denying Request for Rehearing, DOE/FE Order No. 3909-A, Docket No. 13-132-LNG, at n.23 (Apr. 2, 2018) (“In this Order, DOE/FE grants Magnolia LNG’s Motion for Leave to Answer because the Answer is relevant to our consideration of the issues raised in Sierra Club’s Rehearing Request.”).

based on an out-of-date regulation providing that the B5.7 Categorical Exclusion does not apply to new construction.¹⁵

While answers to answers may be acceptable in limited circumstances,¹⁶ Movants have failed to affirmatively support their Motion for Leave as they state the Answer to Answer is only “**relevant to DOE’s consideration of issues raised in [Movants’] DOE Protest[,]**”¹⁷ and not the Applicants’ Answer to Protest. As such, Movants effectively seek the opportunity to make an out-of-time supplement to their deficient Protest. In this regard, the Movants seek to introduce new information and issues that could have been raised in their original Protest.¹⁸ Permitting the Movants to inject new controversies and additional information into the record – much of which is not relevant to Applicants’ Answer to Protest – a month after the close of the protest, comment and intervention deadline, and three months after DOE’s issuance of the Notice of Application, creates a moving target that only serves to encourage administrative delay and further confuse the record before DOE. DOE should not reward the Movants’ disruptive tactics here by granting the Motion for Leave.

¹⁵ Contrary to Movant’s attempt to paper over their material error, “new construction” was the crux of their legal argument regarding the B5.7 Categorical Exclusion in the Protest. See, e.g., *Answer to Answer*, at 8, n.38 (“Intervenors agree that the current version of Categorical Exclusion B5.7 no longer contains the ‘new construction’ limitation that appeared in the prior version that was effective before November 2011 and through January 3, 2021.... **Intervenor’s Protest never depended on facility construction. Instead, it was solely focused on the impacts associated with marine vessel transportation**—the entire subject of Categorical Exclusion B5.7, and the one effect category DOE concedes lies within its exclusive authority.”) (emphasis added); but see *Protest*, at 18 (“**DOE’s Categorical Exclusion cannot be applied here because it specifically exempts ‘new construction’** from the list of actions which can be excluded from an Environmental Assessment, or an EIS, under NEPA.”) (emphasis added); see also *id.* at 18 (“Moreover, as was explained, **the Categorical Exclusion is not applicable here because it specifically excludes new construction** from its reach”) (emphasis added); see also *id.* at 19 (“As was already explained, **CCL is also new construction**, so it was never eligible for a Categorical Exclusion.”) (emphasis added).

¹⁶ See, e.g., *supra* n.14.

¹⁷ *Answer to Answer*, at 2.

¹⁸ See, e.g., *Answer to Answer*, at 7-11.

Because Movants advance no valid support for their Motion for Leave and untimely efforts to supplement their Protest to cure its defects, there is no reasonable basis to grant the Motion for Leave, and the Answer to Answer should be struck from the record.

III. **CONCLUSION**

WHEREFORE, for the forgoing reasons, Applicants request that DOE accept the instant Answer to Motion, deny the Movants' Motion for Leave and strike the Answer to Answer from the record of this proceeding.

Respectfully submitted,

/s/ Lisa M. Tonery
Lisa M. Tonery
Mariah T. Johnston
Jacob I. Cunningham
Anna K. Simon
Attorneys for
Corpus Christi Liquefaction, LLC,
Corpus Christi Liquefaction Stage IV, LLC
and Cheniere Marketing, LLC

Dated: July 27, 2026

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 New York, N.Y., this 27th day of July, 2026.

/s/ Dionne McCallum-George

Dionne McCallum-George

Senior Executive Assistant on behalf of

Corpus Christi Liquefaction, LLC,

Corpus Christi Liquefaction Stage IV, LLC and

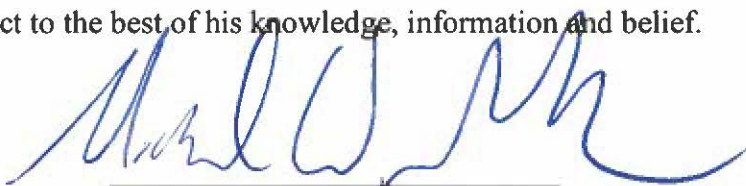
Cheniere Marketing, LLC

VERIFICATION

State of Texas

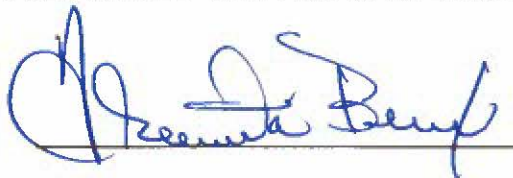
County of Harris

BEFORE ME, the undersigned authority, on this day personally appeared Michael Weller, who, having been by me first duly sworn, on oath says that he is Vice President, Environmental and Regulatory Projects, and Managing Counsel, for Cheniere Energy, Inc. and is duly authorized to make this Verification; that he has read the foregoing instrument and that the facts therein stated are true and correct to the best of his knowledge, information and belief.



Michael Weller
Vice President, Environmental and Regulatory Projects
Managing Counsel

SWORN TO AND SUBSCRIBED before me on the 27th day of July, 2026.



Name: Trenita Breaux

Title: Notary Public

My Commission expires: July 3, 2029

