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

In the Matter of:	)	
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	)	
Venture Global CP2 LNG, LLC	)	**Docket No. 26-____-LNG**
	)	

APPLICATION OF VENTURE GLOBAL CP2 LNG, LLC FOR AUTHORIZATIONS TO EXPORT LIQUEFIED NATURAL GAS TO FREE TRADE AND NON-FREE TRADE AGREEMENT NATIONS

Keith Larson
General Counsel
Venture Global LNG, Inc.
1001 19th Street North
Suite 1500
Arlington, VA 22209
Telephone: (202) 759-6736
klarson@ventureglobalLNG.com

J. Patrick Nevins
Latham & Watkins LLP
555 Eleventh Street, N.W.
Suite 1000
Washington, D.C. 20004
Telephone: (202) 637-3363
patrick.nevins@lw.com

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Pursuant to Section 3 of the Natural Gas Act ("NGA")[1] and Part 590 of the regulations of the Department of Energy ("DOE"),[2] Venture Global CP2 LNG, LLC ("CP2 LNG" or the "Applicant") hereby submits for filing this application ("Application") to the Hydrocarbons and Geothermal Energy Office of the DOE ("DOE/HGEO")[3] for long-term, multi-contract authorizations (along with related short-term authorizations[4]) to export additional domestically produced liquefied natural gas ("LNG") from CP2 LNG's export terminal and associated facilities, which are currently under construction on the east side of the Calcasieu Ship Channel and the

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1 15 U.S.C. § 717b (2018).

2 10 C.F.R. Part 590 (2026).

3 DOE's Office of Fossil Energy ("FE") changed its name on July 4, 2021, to the Office of Fossil Energy and Carbon Management ("FECM") and then, on November 20, 2025, FECM changed its name to the Hydrocarbons and Geothermal Energy Office ("HGEO"). The Applicant herein uses the acronym for the office in effect at the time of the relevant order or action discussed, or simply uses the term DOE to encompass the office. Authority to regulate the import and export of natural gas under NGA Section 3 has been delegated to the Assistant Secretary for (as currently termed) HGEO, most recently pursuant to Redelegation Order No. SD-DEL-FE1-2023, issued on April 10, 2023.

4 On December 18, 2020, DOE issued a Policy Statement discontinuing its practice of issuing separate long-term and short-term authorizations for exports of natural gas from the same facility. "Including Short-Term Export Authority in Long-Term Authorizations for the Export of Natural Gas on a Non-Additive Basis," Policy Statement, 86 Fed. Reg. 2243 (Jan. 12, 2021) ("Including Short-Term Policy Statement"). Instead, long-term authorizations to export domestically produced natural gas may include additional authority to export the same approved volume pursuant to transactions with terms of less than two years (including commissioning volumes) on a non-additive basis. Accordingly, CP2 LNG requests that its new long-term authorizations also allow for the export of the approved volumes on a short-term or spot basis.

nearby Monkey Island, in Cameron Parish, Louisiana (the "CP2 LNG Terminal" or the "Terminal"). The authorizations to export additional volumes of natural gas requested in this Application relate to the new liquefaction facilities capable of producing a peak output of approximately eleven and seven-tenths (11.7) million metric tonnes per annum ("MTPA") of LNG, as well as other related facilities, proposed as the CP2 LNG Expansion Project (or "Project").

The CP2 LNG Terminal under construction, as currently authorized by the Federal Energy Regulatory Commission ("FERC"),[5] has a nameplate liquefaction and export capacity of approximately 20 MTPA and a peak achievable capacity of 28.0 MTPA.[6] CP2 LNG is currently authorized by DOE (pursuant to orders issued in Docket 21-131-LNG) to export from the Terminal 1,446 billion cubic feet ("Bcf") of natural gas per year (equivalent to approximately 28.0 MTPA of LNG) to any country which has, or in the future develops, the capacity to import LNG via ocean-going carriers and with which the U.S. either (1) has a Free Trade Agreement ("FTA") requiring national treatment for trade in natural gas[7] pursuant to an order issued in 2022,[8] or (2) does not have such an FTA but with which trade is not prohibited by U.S. law or policy ("non-FTA

[5] The Secretary of DOE has delegated to FERC the authority to approve or disapprove the construction and operation of natural gas import and export facilities and the site at which such facilities shall be located. The most recent such delegation is DOE Delegation Order No, 00-044.00A, effective May 16, 2006.

[6] *Venture Global CP2 LNG, LLC; Venture Global CP Express, LLC*, 187 FERC ¶ 61,199 (2024), *reh'g*, 189 FERC ¶ 61,148 (2024), *reh'g*, 191 FERC ¶ 61,153 (2025), *reh'g and stay denied*, 192 FERC ¶ 61,155 (2025), *appeal pending sub nom. Dardar v. FERC*, Case No. 24-1291, et al. (D.C. Cir. filed Sept. 24, 2024).

[7] 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. In addition to current FTA nations, CP2 LNG expressly requests that its FTA authorization include any additional nation which DOE subsequently identifies publicly as having entered into a free trade agreement providing for national treatment for trade in natural gas, or that otherwise is treated as (or equivalent to) an FTA nation by the U.S., provided that the destination nation has the capacity to import LNG. For ease of reference, Applicant refers herein to all such nations simply as "FTA nations."

[8] *Venture Global CP2 LNG, LLC*, DOE/FECM Order No. 4812, Docket No. 21-131-LNG, Order Granting Long-Term Authorization to Export Liquefied Natural Gas to Free Trade Agreement Nations (Apr. 22, 2022).

nations"), pursuant to an order issued in 2025.[9] CP2 LNG has concluded, however, that the peak liquefaction capacity of its currently authorized facilities is actually 35.0 MTPA of LNG, or approximately 1,873 Bcf/yr of natural gas. Accordingly, to reflect this "uprate" in the authorized peak output, CP2 LNG has previously filed to amend its existing authorizations, in an application submitted to DOE on February 20, 2026 in Docket No. 21-131-LNG, as well as a corresponding application filed with FERC on December 29, 2025 in its Docket No. CP26-55. DOE/HGEO authorized the increased quantity for exports to FTA nations in Order No. 4812-A issued on June 17, 2026. The non-FTA portion of that application, as well as the related FERC application to increase the authorized peak output of its already permitted facilities, without the addition of any new facilities, remain pending.

CP2 LNG now proposes to expand its Terminal to add six additional liquefaction blocks, another gas-fired power plant, a third marine berth within the already approved berthing area, and related facilities, all as proposed to FERC in a new application filed on May 26, 2026 in its Docket No. CP26-530-000.[10] Notably, FERC previously waived the application of its usual "pre-filing" process for the CP2 LNG Expansion Project.[11] The proposed CP2 LNG Expansion

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[9] *Venture Global CP2 LNG, LLC*, DOE/FECM Order No. 5265-A, Docket No. 21-131-LNG, Final Order Granting Long-Term Authorization to Export Liquefied Natural Gas to Non-Free Trade Agreement Nations (Oct. 21, 2025) (hereinafter "CP2 LNG Final Non-FTA Order"), *reh'g denied,* DOE Order No. 5265-B (Mar. 26, 2026), *appeal pending sub nom. Sierra Club, et al. v. DOE*, D.C. Circuit Case No. 26-1036.

[10] The FERC application for the CP2 LNG Expansion Project (which is available in FERC's eLibrary as Accession Nos. 20260526-5250, 20260526-5251 and 20260526-5252) was filed jointly by CP2 LNG and its affiliate, Venture Global CP Express, LLC (CP Express). For its part, CP Express requested FERC authorization to construct, own, operate and maintain an expansion created by the addition of new compression and related facilities on the CP Express Pipeline, which is also under construction and will extend from Jasper County in east Texas to the CP2 LNG Terminal. The proposed CP Express Expansion will add 1,900,000 Dth/day of incremental firm transportation capacity onto the previously authorized pipeline project, and CP2 LNG has entered into a binding precedent agreement with CP Express for all of the incremental firm transportation capacity.

[11] CP2 LNG and CP Express filed a request for waiver of the pre-filing process in FERC Docket No. PF26-8 on March 24, 2026. FERC Accession No. 20260324-5193. FERC's Director of the Office of Energy Projects granted the requested waiver in a letter order issued on April 16, 2026. FERC Accession No. 20260416-3048.

Project facilities will be interconnected with the currently authorized CP2 LNG Terminal (including tie-ins to the existing LNG storage tanks and the ship-loading marine facilities) and will be operated together with the authorized CP2 LNG Terminal as a single LNG export facility on a fully integrated basis. The proposed new Terminal Expansion facilities will increase the maximum peak liquefaction and export capacity of the CP2 LNG Terminal by 11.7 MTPA or approximately 620.5 Bcf per year.

To reflect the new facilities to be added in the CP2 LNG Expansion Project, CP2 LNG requests here that DOE/HGEO issue a new authorization for the export of an additional 620.5 Bcf per year from its Terminal to both FTA nations and non-FTA nations, on a non-additive basis.[12] The Applicant requests the export authorizations on its own behalf and as agent for other entities that may hold title to the LNG at the time of export from the CP2 LNG Terminal, consistent with DOE precedent and its existing authorizations. CP2 LNG requests a term of twenty (20) years after the commencement of commercial exports under the authorization for both the FTA and non-FTA export authorizations, plus a three-year make-up period at the end of that term consistent with recent DOE practice including CP2 LNG's existing authorization.[13]

Consistent with the different standards under Section 3 of the NGA applicable to natural gas exports to FTA and non-FTA nations[14] and with previous DOE orders, CP2 LNG requests

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[12] Assuming that DOE first approves the CP2 LNG uprate application, as filed on February 20, 2026, the resulting total authorized exports from the Terminal after action on this Application will be 2,493.5 Bcf per year (*i.e.*, the currently authorized amount of 1,446 Bcf plus the 427 Bcf associated with the previously filed uprate plus the 620.5 Bcf related to the CP2 LNG Expansion Project proposed in this Application).

[13] *See* CP2 LNG Final Non-FTA Order, *supra* n.9, at 64-55. *See also, e.g., Port Arthur LNG Phase II, LLC*, DOE/FECM Order No. 5292-A, Docket No. 20-23-LNG at 3-5 (June 30, 2025) (amending authorization to allow a three-year make-up period past the end of 2050 to export the approved volumes of LNG).

[14] NGA Section 3(c) provides that the export of natural gas to a nation with which there is in effect an FTA requiring national treatment for trade in natural gas shall be deemed to be consistent with the public interest and requires that such applications be granted without modification or delay. Section 3(a) provides that applications to export LNG to non-FTA nations shall be authorized unless the Secretary finds that the proposed exports will not be

that DOE/HGEO sequentially issue two separate orders authorizing the proposed incremental LNG exports to FTA nations and to non-FTA nations, respectively.

In support of this Application, CP2 LNG respectfully states the following:

I. DESCRIPTION OF THE APPLICANT

The exact legal name of the Applicant is Venture Global CP2 LNG, LLC. CP2 LNG is a Delaware limited liability company with its primary place of business located at 1401 McKinney Street, Suite 2600, Houston, TX 77010. CP2 LNG is primarily engaged in the business of developing the Export Terminal in Cameron Parish, Louisiana.

CP2 LNG is an indirect, wholly owned subsidiary of Venture Global LNG, Inc. ("Venture Global"), which is a Delaware corporation with its principal place of business located at 1001 19th Street North, Suite 1500, Arlington, VA 22209. Venture Global is a long-term, low-cost provider of U.S.-produced LNG sourced from resource rich North American natural gas basins to world markets. In addition to the CP2 LNG Terminal, Venture Global is the developer, owner, and operator of the Calcasieu Pass LNG Terminal that is currently in operation and the Plaquemines LNG Terminal that is under construction and commissioning, which are located in Cameron Parish and Plaquemines Parish, Louisiana, respectively. Additional information regarding Venture Global and its leadership, personnel, and projects is available at the company's website: https://ventureglobal.com/.

Venture Global's parent company – Venture Global, Inc. ("VG") – is a Delaware corporation with the same principal address as Venture Global, whose Class A common stock is

consistent with the public interest. Such exports are presumptively in the public interest and that presumption can be overcome only through an affirmative demonstration that the proposed export is inconsistent with the public interest, as explained below.

publicly traded and listed on the New York Stock Exchange (NYSE: VG). As of the date of this Application, VG's controlling shareholder, Venture Global Partners II, LLC ("VG Partners"), holds approximately 97.5% of the combined voting power of VG's stock, and controls the management and policies of Venture Global and, thus, controls CP2 LNG. VG Partners is a Delaware limited liability company with the same principal address as Venture Global, and it is 50 percent owned and controlled by each of the two founders of Venture Global, Michael A. Sabel and Robert B. Pender.

The officers and directors of CP2 LNG are all U.S. citizens. The Applicant is not owned, in whole or in part, directly or indirectly, or subsidized directly or indirectly, by any foreign government nor is it committed by contract to allow such ownership or subsidy by any foreign government.

II. CORRESPONDENCE AND COMMUNICATIONS

All correspondence and communications concerning this Application should be addressed to the following persons:

Keith Larson
General Counsel
Venture Global LNG, Inc.
1001 19th Street North
Suite 1500
Arlington, VA 22209
Telephone: (202) 759-6736
klarson@ventureglobalLNG.com

J. Patrick Nevins
Latham & Watkins LLP
555 Eleventh Street, N.W.
Suite 1000
Washington, D.C. 20004
Telephone: (202) 637-3363
patrick.nevins@lw.com

III. BACKGROUND AND UPDATE REGARDING THE AUTHORIZED TERMINAL

The CP2 LNG Export Terminal currently under construction is located on an approximately 737.3-acre site on the east side of the Calcasieu Ship Channel, in Cameron Parish, Louisiana. The Project, as currently authorized by FERC, has a nameplate liquefaction and export

capacity of 20.0 MTPA and a peak achievable capacity of 28.0 MTPA. The liquefaction facilities consist of 18 liquefaction blocks, each containing two single mixed refrigerant process trains, a refrigerant storage site, and piping that connects the refrigerant storage site and the process trains. Other authorized facilities for the Export Terminal include the following: six pre-treatment facilities; four full containment, above-ground LNG storage tanks each with a capacity of approximately 200,000 cubic meters ("m^3"); two electric power generation plants with a combined nameplate capacity of 1,470 megawatts ("MW"); and two LNG loading docks, each designed to structurally accommodate LNG carriers with capacity of 120,000 to 185,000 m^3.

FERC initially authorized siting, construction, and operation of the CP2 LNG Terminal Project in June 2024; but decided in a rehearing order issued in November 2024 to prepare a supplemental Environmental Impact Statement ("EIS") to evaluate further the Projects' cumulative air impacts, and ordered that no authorizations to proceed with construction would be issued until the Commission issued a further merits order. After issuing that supplemental EIS, FERC in May 2025 held, again, that the cumulative air emissions associated with the Project are not significant, that the Project is an environmentally acceptable action, and accordingly finalized its authorization.

In Docket No. 21-131-LNG, DOE granted CP2 LNG long-term, multi-contract authority to export LNG from its Terminal to FTA nations in DOE/FECM Order No. 4812 on April 22, 2022. In the same docket, DOE conditionally authorized exports by CP2 LNG to non-FTA nations in DOE/FECM Order No. 5246 issued on March 19, 2025. In that conditional authorization, DOE explained that it had recently undertaken a study evaluating exports of domestically produced LNG, entitled 2024 LNG Export Study: Energy, Economic, and Environmental Assessment of

U.S. LNG Exports ("2024 LNG Export Study"), and that the public comment period for it remained open. After completing its consideration of the 2024 LNG Export Study, DOE granted final authorization of the exports by CP2 LNG to non-FTA nations in DOE/FECM Order No. 5246-A issued on October 21, 2025, and then denied rehearing in DOE/HGEO Order No. 5265-B on March 26, 2026. Those orders authorize CP2 LNG to export LNG to both FTA and non-FTA nations in a volume equivalent to 1,446 Bcf/yr (on a non-additive basis), which is approximately 28.0 MTPA of LNG.

Venture Global has had tremendous success with the commercial development of the CP2 LNG Project. CP2 LNG has entered into binding, long-term LNG SPAs for 18.5 MTPA of its nameplate liquefaction capacity with major international companies, as well as contracts for all excess LNG produced above the nameplate capacity. All of these long-term SPAs have been filed by CP2 LNG with DOE in accordance with the requirements of its export authorizations and DOE policies.[15]

On July 28, 2025, Venture Global announced its final investment decision (FID) and the closing of the $15.1 billion project financing for the initial phase of the CP2 LNG Project (which includes 14.4 MTPA of nameplate capacity) and the affiliated CP Express Pipeline.[16] The FERC Staff issued its first notices to proceed for CP2 LNG on May 30, 2025, authorizing mobilization and site preparation work as well as the start of its test pile program, and it has subsequently issued a series of additional notices to proceed for CP2 LNG to proceed with construction. On March 13,

[15] CP2 LNG's filings related to its long-term contracts are available on DOE/HGEO's website at: https://www.energy.gov/hgeo/articles/venture-global-cp2-lng-llc-facility.

[16] *See* Press Release, Venture Global LNG, *Venture Global Announces Final Investment Decision and Financial Close for Phase 1 of CP2 LNG* (July 28, 2025), *available at* https://ventureglobal.com/2025/07/28/venture-global-announces-final-investment-decision-and-financial-close-for-phase-1-of-cp2-lng/.

2026, Venture Global announced the FID for the second phase of the CP2 LNG Project, with the successful closing of an additional $8.6 billion project financing.[17] As they receive the necessary authorizations from FERC Staff, CP2 LNG and CP Express are both proceeding with construction of the entire project so as to commence operations safely and as quickly as feasible. Details regarding the status of the ongoing construction of the Export Terminal are available in the numerous filings and issuances in FERC Docket No. CP22-21, including in monthly status reports.

On December 29, 2025, CP2 LNG filed an application with FERC requesting authorization to amend its authorizations for the CP2 LNG Terminal to increase the authorized peak liquefaction capacity achievable from 28.0 MTPA to 35.0 MTPA, which is pending in FERC Docket No. CP26-55. That proposed increase in the authorized peak liquefaction capacity reflects refinements in the conditions and assumptions concerning the maximum potential output of the already authorized facilities; it does not involve the construction of any new facilities or modification of the already authorized facilities. CP2 LNG submitted a corresponding application to the DOE on February 20, 2026, in which it requested that its existing authorizations to export LNG to both FTA and non-FTA countries be increased from 1,446 Bcf/yr of natural gas (approximately 28.0 MTPA of LNG) to 1,873 Bcf/yr (or 35.0 MTPA), which remains pending.[18]

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[17] *See* Press Release, Venture Global LNG, *Venture Global Announces Final Investment Decision and Financial Close for Phase 2 of CP2* LNG (Mar. 13, 2026), *available at* https://ventureglobal.com/2026/03/13/venture-global-announces-final-investment-decision-and-financial-close-for-phase-2-of-cp2-lng/.

[18] Application of Venture Global CP2 LNG, LLC for Limited Amendment of Authorizations to Export Liquefied Natural Gas to Free Trade and Non-Free Trade Agreement Nations, filed in Docket No. 21-131-LNG, *available at* http://energy.gov/sites/default/files/202602/CP2 Uprate DOE Application %28022026%29.pdf.

IV. DESCRIPTION OF THE CP2 LNG EXPANSION PROJECT

Given extraordinary customer demand for incremental LNG beyond the output of its already authorized facilities and the significant commercial, environmental, and timing advantages of a brown-field Project expansion, as well as the current Administration's strong support of LNG exports,[19] CP2 LNG is now proposing the CP2 LNG Expansion Project. The Project will allow for needed incremental exports of abundant, clean-burning U.S. domestic natural gas supplies to overseas markets, which are particularly needed given recent developments in the Middle East[20] and the consequent need for incremental LNG for U.S. allies and trade partners. Notably, President Trump recently proclaimed that "ensuring sufficient natural gas and liquefied natural gas (LNG) capacity is critical to sustaining United States defense operations and ensuring allied energy security [and that] [i]nadequate pipelines, processing, storage, or natural gas and LNG export capacity would leave the United States and its partners dangerously exposed in times of crisis."[21] Furthermore, as a "brownfield" expansion

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[19] Executive Orders issued on the first day of the Administration recognized the benefits of LNG exports. The Energy Emergency Executive Order recognized that "the United States has the potential to use its unrealized energy resources domestically, and to sell to international allies and partners a reliable, diversified, and affordable supply of energy. This would create jobs and economic prosperity for Americans forgotten in the present economy, improve the United States' trade balance, help our country compete with hostile foreign powers, strengthen relations with allies and partners, and support international peace and security." Exec. Order No. 14,156, 90 Fed. Reg. 8433 (Jan. 20, 2025). That same day, the Unleashing Energy Executive Order directed the Department of Energy ("DOE") to "restart reviews of applications for approvals of liquified [sic] natural gas export projects as expeditiously as possible, consistent with applicable law." Exec. Order No. 14,154, 90 Fed. Reg. 8353 (Jan. 20, 2025). That Executive Order also directs that "[i]n assessing the 'Public Interest' to be advanced by any particular application" to export LNG under NGA Section 3(a), DOE "shall consider the economic and employment impacts to the United States and the impact to the security of allies and partners that would result from granting the application." *Id.* Of course, since then, DOE has expeditiously moved forward with "unleashing" LNG exports.

[20] *See, e.g.,* U.S. Energy Information Administration, Today in Energy, "U.S. natural gas exports to grow nearly 30% by 2027 as LNG facilities ramp up," (Apr. 16, 2026), *available at* https://www.eia.gov/todayinenergy/detail.php?id=67484 ("recent disruptions to LNG exports through the Strait of Hormuz are increasing demand for LNG cargoes from outside the strait. The disruptions, mostly concentrated in Qatar, currently represent over 10 Bcf/d, or 20% of global supply.")

[21] "Presidential Determination Pursuant to Section 303 of the Defense Production Act of 1950, as Amended, on Natural Gas Transmission, Processing, Storage, and Liquefied Natural Gas Capacity," Memorandum to the Secretary of Energy (Apr. 20, 2026), *available at* https://www.whitehouse.gov/presidential-

that will add incremental liquefaction at a previously authorized LNG Terminal that will be constructed in conjunction with other infrastructure already authorized and under construction, CP2 LNG will benefit from construction efficiencies, while reducing costs, and minimizing environmental impacts compared to a greenfield project.

The total estimated construction cost for the currently authorized CP2 LNG project is in excess of $30 billion, and the estimated added cost of the proposed CP2 LNG Expansion Project exceeds $10 billion. The proposed Project is expected to require a peak workforce of up to 3,000 workers on site for approximately six months. Over an approximately three-year construction period, the construction workforce will typically average 1,600 workers for the Terminal Expansion and an additional average of 175 workers for the related expansion of the CP Express pipeline system, all with an estimated average annual salary of $150,000. The Project is projected to result in the permanent hiring of approximately 150 workers. Construction and related activities also will create business opportunities for local suppliers and service providers, likely boosting supply chain revenues and supporting job growth in related industries. Furthermore, the Project is estimated to generate more than $1.8 billion in net new local tax revenue from the start of construction through the estimated 20-year lifespan of the Project and to generate more than $460 million in net new, direct tax revenue for the State of Louisiana during the same time. Overall, with addition of the Expansion Project proposed here, CP2 LNG Terminal will produce enormous economic and tax benefits to Cameron Parish and the State of Louisiana, as well as all the other benefits of LNG exports well-understood by DOE.[22]

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actions/2026/04/presidential-determination-pursuant-to-section-303-of-the-defense-production-act-of-1950-as-amended-on-natural-gas-transmission-processing-storage-and-liquefied-natural-gas-capacity/.

[22] *See, e.g.*, Press Release, DOE, "DOE FINALIZES 2024 LNG EXPORT STUDY, PAVING WAY FOR STRONGER AMERICAN ENERGY EXPORTS" (May 19, 2025), *available at* https://www.energy.gov/articles/doe-

All the currently authorized CP2 LNG Terminal Facilities are being constructed on about 737.3 acres near the mouth of the Calcasieu Ship Channel in Cameron Parish, Louisiana. CP2 LNG has contractually secured all the land required for construction and operation of those facilities through agreements with landowners (as reflected in the lease and lease option agreements filed with DOE on December 17, 2021 in Docket No. 21-131-LNG). The Terminal Facilities included in the CP2 LNG Expansion Project will all be located on the land covered by those same landowner agreements.

All of the proposed CP2 LNG Expansion Project facilities are described in detail in the Applicant's application submitted to FERC on May 26, 2026, for authorization to site, construct and operate the new facilities. Natural gas delivered to the Terminal for the CP2 LNG Expansion Project will first be pre-treated in three new pretreatment systems to be added to the six such systems already authorized. The Project will also include two nitrogen removal units and three LNG expanders to remove excess nitrogen that may be present in the feed gas. After pre-treatment, the natural gas will be liquefied using six (6) new single mixed refrigerant ("SMR") liquefaction blocks and ancillary facilities added in the Project, which will be essentially identical to the previously authorized 18 liquefaction blocks at the Terminal. Each liquefaction block includes two SMR liquefaction process units, separator vessels, a cold box, air cooled exchanges, a suction scrubber and a heavy hydrocarbon removal unit. In aggregate, the new liquefaction facilities added in the Project will be capable of producing approximately 11.7 MTPA of LNG at peak output. Power for the liquefaction facilities, and the CP2 LNG Expansion

finalizes-2024-lng-export-study-paving-way-stronger-american-energy-exports (announcing DOE's "Response to Comments for the 2024 LNG Export Study: Energy, Economic, and Environmental Assessment of U.S. LNG Exports," (hereinafter "DOE Response to Comments"), *available at* https://www.energy.gov/sites/default/files/2025-05/2024%20LNG%20Export%20Study_Response%20to%20Comments_Final_05.19.2025.pdf).

Project overall, will be provided by a new natural gas-fired combined cycle power plant, which will include five gas turbines, five heat recovery steam generators, and two steam generators with total generating capacity of 720 MWs, all housed in a new building on the Terminal site. New boil-off gas compressors, and associated flash and gas relief systems, will be added to recover boil-off and flash gas to be used as fuel for the power generation.

After liquefaction, the LNG will be transferred via the aboveground piping to the four already authorized full-containment, LNG storage tanks (each with net usable capacity of approximately 200,000 m^3); no new LNG storage is proposed as part of the CP2 LNG Expansion Project. From the LNG storage tanks, the LNG will be pumped through cryogenic transfer piping onto ocean-going LNG carriers at either the new marine berth included in the Expansion Project or one of the two marine berths that were previously authorized, all of which will be operated on an integrated basis. The new marine facilities included in the proposed Project will be constructed within the approved footprint of the authorized marine facilities on the southwest shoreline of Monkey Island, which includes a 3-acre parcel also located on Monkey Island that CP2 LNG is in the process of acquiring. Like the previously approved marine berths, the new berth to be added in this Project will be capable of receiving LNG carriers with a cargo carrying capacity ranging from 120,000 to 185,000 m^3. All marine operations and vessels will comply with applicable U.S. Coast Guard ("USCG") requirements and maritime laws, including the regulations for waterfront LNG facilities (33 C.F.R. Part 127 and Executive Order 10173).

The particular natural gas supplies that will be liquefied at the CP2 LNG Terminal cannot be known at this time and undoubtedly will change over the life of the Project. The Project by design is not dependent upon any particular natural gas supply. The CP Express Pipeline connecting to the Terminal will have numerous direct interconnections with other pipelines,

providing access to numerous markets with ample domestic natural gas supplies and liquidity. Access to the integrated pipeline grid through CP Express will enable CP2 LNG, or its customers, to purchase natural gas from a multitude of sources of conventional and non-conventional U.S. production. Such supplies could be produced from any of a wide variety of production areas, including conventional Gulf Coast production regions, the robust and expanding supplies produced from nearby shale gas plays such as the Haynesville, Permian, Barnett, and Bossier formations, as well as the more distant but prolific Marcellus and Utica shale regions.

CP2 LNG plans to start construction of the new facilities for the Expansion Project soon after receiving the receipt of FERC authorization and other necessary regulatory permits and approvals. Venture Global has a proven ability, demonstrated at its Calcasieu Pass and Plaquemines LNG projects as well as with the previously authorized CP2 LNG facilities, to finance and construct LNG export facilities safely and expeditiously to begin supplying incremental American natural gas that is needed in international markets. To do the same with the CP2 LNG Expansion Project, CP2 LNG requested FERC authorization of its Project by the end of this calendar year.

While it does not propose an explicit "phasing" of the CP2 LNG Expansion Project, CP2 LNG plans to construct and commission the incremental Terminal facilities sequentially, with requisite implementation plan authorizations from FERC Staff just as is being done now with the already-authorized Terminal facilities.[23] Provided that FERC authorizes the Project by the end of 2026 and construction commences promptly thereafter, CP2 LNG is targeting first production of

[23] CP2 LNG does not anticipate that the development, construction or operation of the CP2 LNG Expansion Project will have any adverse impact on the timely construction and commissioning of its previously authorized facilities.

LNG from the Project by approximately the end of 2028. Construction of the CP2 LNG Expansion Project is projected to take approximately 35 months, overlapping with a sequential commissioning process that will continue past construction. CP2 LNG anticipates placing its Expansion Project facilities in-service, after completing commissioning, approximately four years after FERC authorization. That timeline, however, may be affected by the time required to reach FID once authorization is received, unforeseen issues that may arise during construction and commissioning, and a number of external factors.

CP2 LNG has not yet entered into any binding contracts with customers for the export of LNG from the CP2 LNG Expansion Project. It will file all long-term, binding contracts associated with the export of LNG from the Project once executed, in accordance with established DOE policy and precedent. Similarly, CP2 LNG has not yet entered into any long-term natural gas supply agreements, but CP2 LNG will file with the DOE such contracts once executed in accordance with established policy and precedent.

V. AUTHORIZATIONS REQUESTED

Consistent with its recent application with FERC for the CP2 LNG Expansion Project, CP2 LNG requests here that DOE/HGEO increase the quantity of its total authorized export volumes from its Terminal by an additional 620.5 Bcf/yr for both FTA nations and non-FTA nations, commencing on the earlier of the date of first export or seven years from the date the requested

authorization is granted by DOE.[24] Consistent with the Including Short-Term Policy Statement,[25] CP2 LNG requests that its export authorizations also allow for the export of natural gas up to the same approved volume pursuant to transactions with terms of less than two years (including commissioning volumes).

CP2 LNG anticipates that it will hold title to the LNG at the time of export and sell the LNG pursuant to SPAs entered into with off-takers. Nevertheless, to maximize flexibility in its customer contracting and consistent with DOE precedent, the Applicant requests authorization to export LNG from the CP2 LNG Expansion Project both on its own behalf and as agent for entities with which it contracts that may hold title to the LNG at the time of export. CP2 LNG will comply fully with all related DOE requirements for both exporters and their agents, including the registration requirements detailed in orders such as *Freeport LNG Development, L.P*. and *Gulf Coast LNG Export LLC*.[26]

CP2 LNG requests a term of twenty (20) years after the commencement of commercial exports under both the requested FTA and non-FTA authorizations, as well as a three-year "make-up" period at the end of the term to export any approved volumes that it was unable to export

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[24] In its orders authorizing non-LNG exports, DOE has consistently imposed the condition that the applicant must commence commercial LNG export operations no later than seven years after the issuance of the order. *E.g.*, *Venture Global Calcasieu Pass, LLC*, DOE/FE Order No. 4346, Docket No. 15-25-LNG at 75-76 (Mar. 5, 2019); *Venture Global Plaquemines LNG, LLC*, Order No. 4446, Docket No. 16-28-LNG (Oct. 16, 2019); CP2 LNG Final Non-FTA Order, *supra* n.9, at 65. *See also* DOE, Rescission of Policy Statement on Export Commencement Deadlines in Authorizations To Export Natural Gas to Non-Free Trade Agreement Countries, 90 Fed. Reg. 14,411 (Apr. 2, 2025) (modifying the standard for extensions of the standard 7-year condition).

[25] *See supra* n.4.

[26] *Freeport LNG Expansion, L.P. and FLNG Liquefaction, LLC*, FE Order No. 2913 (Feb. 10, 2011) (establishing the criteria for exports for agents subsequently adopted in a number of orders); *Gulf Coast LNG Export LLC*, DOE/FE Order No. 3163 at 7-8 (Oct. 16, 2012) (reiterating agency policy). Thus, if acting as an agent for others, CP2 LNG Expansion will register with DOE each LNG title holder for which it will export LNG as agent. In that event, Applicant also will provide the DOE with a written statement by the title holder that acknowledges and agrees to (1) comply with all requirements in the LNG's long-term export authorization, and (2) include those requirements in any subsequent purchase or sale agreement entered into by the title holder.

during the authorized 20-year export period. When DOE began to authorize LNG exports from the lower-48 United States, it adopted a standardized 20-year term for non-FTA authorizations, which it explained as follows:

> we are mindful that LNG export facilities are capital intensive and that, to obtain financing for such projects, there must be a reasonable expectation that the authorization will continue for a term sufficient to support repayment. We find that a 20-year term is likely sufficient to achieve this result. We base that conclusion on the fact that [the applicant] has submitted to DOE/FE LTAs with 20-year terms, which is also the length of all LNG export contracts DOE/FE has received to date.[27]

Effective August 25, 2020, DOE discontinued its prior practice of granting a standard 20-year export term for long-term authorizations to export domestically produced natural gas from the lower-48 states to non-FTA nations, adopting instead a longer term extending through December 31, 2050.[28] DOE explained the basis for the lengthened export term in part as follows:

> a 30-year export term would better match the operational life of LNG export facilities, which are typically designed for a service life of 30 to 50 years. A 30-year export term thus would provide authorization holders with greater security in financing their export facility and would maximize their ability to enter into natural gas supply and export contracts for a longer period of time…and a 30-year export term would benefit U.S. authorization holders as they compete for long-term export contracts in the global market.[29]

To support that policy, DOE also recognized that a term of longer than 20 years "will provide important commercial benefits to existing and future authorization holders in the lower-48 states,

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[27] *Freeport LNG Expansion, L.P., et al.*, DOE/ FE Order No. 3282–C, Docket No. 10-161-LNG at 89 (Nov. 14, 2014).

[28] "Extending Natural Gas Export Authorizations to Non-Free Trade Agreement Countries Through the Year 2050," Notice of Final Policy Statement and Response to Comments, 85 Fed. Reg. 52237 (Aug. 25, 2020) (the "2050 Policy Statement").

[29] *Id.* at 52,240.

while enhancing long-term regulatory certainty for both authorization holders and foreign buyers of U.S. LNG."[30]

The standard duration of the export authorizations through 2050 has increased importance for the CP2 LNG Expansion Project. While CP2 LNG is targeting first LNG exports from the Project by approximately the end of 2028, achievement of that goal is uncertain and subject to expedited regulatory approvals and other external factors. Furthermore, as with the prior Venture Global projects, the Expansion Project is expected to have an extended commissioning period and the long-term SPAs associated with the Project (which likely will have 20-year terms) may commence after 2030. Therefore, application of the generally applicable term extending only through 2050 could result here in a term of *less than* 20-years after the long-term SPAs actually begin. That result would be contrary to DOE's reasoning not only in the 2050 Policy Statement extending the standard term duration, but also in its prior adoption of standardized 20-year terms. That is, a term of less than 20-years after the commencement of commercial operations exports under long-term contracts under the requested authorization would put the Applicant at a commercial disadvantage, particularly in competition with LNG producers elsewhere in the world, would be inconsistent with the economic life of the Project, and could present financing challenges. Accordingly, to avoid this result, CP2 LNG respectfully requests, for its non-FTA authorization as well as the FTA authorization, a term of 20 years after the start of commercial exports under the requested authorization.[31]

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[30] *Id.* at 52,241.

[31] Alternatively, should the DOE decide to develop a new policy statement extending the term of its long-term export authorizations beyond 2050 prior to acting on this Application, CP2 LNG would request that the terms of its non-FTA authorization and FTA authorization conform to such policy statement.

CP2 LNG requests the issuance of separate orders authorizing the requested LNG exports: (1) to any country which has, or in the future develops, the capacity to import LNG via ocean-going carriers and with which the U.S. has, or in the future enters into, an FTA requiring the national treatment for trade in natural gas or is otherwise deemed by the United States as being treated as an FTA nation; and (2) to any country with the capacity to import LNG via ocean-going carriers and with which the United States does not have such an FTA but with which trade is not prohibited by United States law or policy. This approach of two separate orders for exports to FTA nations and non-FTA nations follows established DOE/HGEO precedent.

For the FTA authorization, CP2 LNG respectfully requests that DOE/HGEO issue it as soon as practicable, consistent with the statutory requirement of issuance of such authorizations without delay. For the non-FTA Authorization, the Applicant also requests issuance as soon as practicable, recognizing that additional time is required for the necessary public interest analysis.

A. EXPORT TO FREE-TRADE NATIONS

CP2 LNG requests that its existing authorization to export LNG from its Terminal to FTA nations be increased by an amount of LNG equivalent to up to 620.5 Bcf/yr of natural gas (approximately equal to 11.7 MTPA) in connection with the CP2 LNG Expansion Project. Section 3(c) of the NGA, as amended by Section 201 of the Energy Policy Act of 1992 (Pub. L. 102-486), requires that applications to authorize exports of natural gas, including LNG, to a nation with which there is in effect a free trade agreement requiring national treatment for trade of natural gas be "deemed to be consistent with the public interest" and "granted without modification or delay."[32] In addition, DOE has consistently held that the otherwise applicable regulatory

[32] 15 U.S.C. § 717b(c) ("For purposes of [15 U.S.C. § 717b(a)] of this section, the importation of the natural gas referred to in [15 U.S.C. § 717b(b)] of this section, or the exportation of natural gas to a nation with which there is in effect a free trade agreement requiring national treatment for trade in natural gas, shall be deemed to be consistent

requirements for public notice and other procedures set forth in 10 C.F.R. Part 590 do not apply to exports to FTA nations.[33]

In accordance with this statutory mandate, the portion of this Application that seeks authorization of exports to FTA nations should be granted without modification or delay. The DOE has consistently followed this approach in granting dozens of long-term authorizations to allow exports of natural gas to FTA nations over many years.[34] Given the mandatory standard of NGA Section 3(a), DOE/HGEO is not required to engage in any analysis of factors affecting the public interest in acting on the FTA aspect of this Application, and has not done so when approving similar applications to export LNG to FTA nations. Nevertheless, further support for the requested FTA authorization is provided by the below presentation concerning the non-FTA authorization to the extent it is deemed necessary or relevant. Consistent with the established practice of DOE/HGEO, the Applicant requests that the requested FTA authorization be granted initially and separately without waiting on the further public interest determination required to address the requested authorization for LNG export to non-FTA nations.

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with the public interest, and applications for such importation or exportation shall be granted without modification or delay.").

[33] *See, e.g.,* Plaquemines Expansion, LLC, DEO/HGEO Order No. 5418 at 8 & n.40 (May 6, 2026); *Venture Global CP2 LNG, LLC*, DOE/FECM Order No. 4812, at 9, n.45; *Venture Global Plaquemines LNG, LLC*, DOE/FE Order No. 3866 at 6, n.8 (July 21, 2016); *Venture Global Calcasieu Pass, LLC*, DOE/FE Order No. 3662, Docket No. 15-25-LNG at 10, n.19 (June 17, 2015).

[34] A list of orders authorizing long-term exports to FTA (and non-FTA) nations, as well as docket numbers and the links to the orders, is available on the DOE/FE website at: https://www.energy.gov/fe/downloads/summary-lng-export-applications-lower-48-states.

B. EXPORT TO NON-FREE-TRADE NATIONS

CP2 LNG also requests that its existing authorization to export LNG from its Terminal to non-FTA nations be increased by an amount of LNG equivalent to up to 620.5 Bcf/yr of natural gas (approximately equal to 11.7 MTPA) in connection with the CP2 LNG Expansion Project, on a non-additive basis to the FTA authorization. The non-FTA portion of the Application must be reviewed pursuant to the statutory standard established in NGA Section 3(a), which provides that:

> [N]o person shall export any natural gas from the United States to a foreign country or import any natural gas from a foreign country without first having secured an order of the [Secretary of Energy] authorizing it to do so. The [Secretary] *shall issue* such order upon application, *unless*, after opportunity for hearing, [the Secretary] finds that the proposed exportation or importation will not be consistent with the public interest.[35]

This statutory language creates a presumption that the proposed export of natural gas is in the public interest. Accordingly, DOE has consistently held that it must grant non-FTA export applications unless opponents of an application overcome this presumption by making an affirmative demonstration that the proposed export is inconsistent with the public interest.[36] This interpretation has been affirmed by the U.S. Court of Appeals for the District of Columbia Circuit.[37]

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[35] 15 U.S.C. § 717b(a) (2006) (emphasis added). The Secretary's authority was established by the DOE Organization Act of 1977, which transferred jurisdiction over gas import and export authorizations from the Federal Power Commission to DOE.

[36] *E.g.*, *Philips Alaska Natural Gas Corp. & Marathon Oil Co.*, DOE/FE Order No. 1473 at 13 (Apr. 2, 1999); *Sabine Pass Liquefaction, LLC*, DOE/FE Order No. 2961 at 28 (May 20, 2011); *Dominion Cove Point LNG, LP*, DOE/FE Order No. 3331-B at 11 (Apr. 18, 2016); *Venture Global Plaquemines LNG, LLC*, Order No. 4446 at 18-19 (Oct. 16, 2019); *Venture Global Calcasieu Pass*, *LLC*, DOE/FE Order No. 4346 at 19 (Mar. 5, 2019); *Sierra Club, et al.*, Order Denying Petition for Rulemaking on Exports of Liquefied Natural Gas, at 10 (July 18, 2023); CP2 LNG Final Non-FTA Order, *supra* n.9, at 26.

[37] *E.g.*, *Sierra Club v. U.S. Dep't of Energy*, 867 F.3d 189 at 203 (D.C. Cir. 2017).

The current Presidential Administration, and DOE as part of it, has strongly supported LNG exports, recognizing that they advance the public interest.[38] Importantly, the DOE last year reaffirmed, after the conclusion of a major study and its consideration of public comments on it, its long-standing conclusion that "exports of LNG from the United States are in the best interest of the American public."[39] As DOE leadership recognized in announcing that conclusion: "The facts are clear: expanding America's LNG exports is good for Americans and good for the world…. LNG supports our economy, strengthens our allies, and enhances national security."[40] Accordingly, the DOE in the current Administration has advanced the "unleashing" of U.S. LNG exports in numerous orders, including authorizations issued for CP2 LNG itself as well as two other Venture Global projects.[41] As Secretary Wright explained upon the issuance of one of those recent non-FTA authorization orders: "Today's authorization is another reminder that this administration is committed to expanding the supply of abundant, affordable, and secure American energy. The data over the past 10 years of U.S. LNG exports clearly shows that we can lead the world in energy production while lowering energy costs here at home."[42]

In authorizing long-term non-FTA exports, DOE has repeatedly and consistently explained that it "continues to subscribe to the principle set forth in our 1984 Policy Guidelines that, under

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38 See the discussion of Executive Orders, *supra* n.19.

39 *See* DOE May 19, 2025 Press Release and related DOE Response to Comments, *supra* n.22.

40 *See* DOE May 19, 2025 Press Release, *supra* n.22.

41 *See* Press Release, DOE, *Energy Department Approves Final Export Authorization for Venture Global CP2 LNG* (Oct. 22, 2025), *available at* https://www.energy.gov/articles/energy-department-approves-final-export-authorization-venture-global-cp2-lng; Press Release, DOE, *DOE Issues Final Non-FTA LNG Export Authorization for Additional Exports From the Venture Global Calcasieu Pass Project* (Aug. 4, 2025), *available at* https://www.energy.gov/articles/doe-issues-final-non-fta-lng-export-authorization-additional-exports-venture-global.; Press Release, DOE, *Energy Department Approves Immediate Additional LNG Exports from Plaquemines LNG* (Mar. 13, 2026), *available at* https://www.energy.gov/articles/energy-department-approves-immediate-additional-lng-exports-plaquemines-lng.

42 Aug. 4, 2025 DOE Press Release, *supra* n.41.

most circumstances, the market is the most efficient means of allocating natural gas supplies."[43] Those 1984 Policy Guidelines to implement NGA Section 3 (which are applicable to exports as well as imports[44]) promote the free and open trade of natural gas.[45] The Policy Guidelines were "designed to establish natural gas trade on a market-competitive basis and to provide immediate as well as long-term benefits to the American economy from this trade."[46] Moreover, the Guidelines provide that:

> The market, not government, should determine the price and other contract terms of imported [or exported] gas. U.S. buyers [sellers] should have full freedom – along with the responsibility – for negotiating the terms of trade arrangements with foreign sellers [buyers]….
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> * * *
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> The policy cornerstone of the public interest standard [of NGA Section 3] is competition. Competitive import [export] arrangements are an essential element of the public interest, and natural gas imported [exported] under arrangements that provide for the sale of gas in volumes and at prices responsive to market demands largely meets the public interest test….[47]

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[43] *E.g.*, *Freeport LNG Expansion, L.P.,* Order No. 3282 at 112 (May 17, 2013); *Lake Charles Exports*, Order No. 3324 at 125 (Aug. 7, 2013); *Dominion Cove Point LNG, LP*, Order No. 3331 at 141 (Sept. 11, 2013); *Freeport LNG,* Order No. 3357 at 154 (Nov. 15, 2013); *Cameron LNG, LLC*, DOE/FE Order No. 3391 at 132 (Feb. 11, 2014); *Jordan Cove Energy Project, L.P.*, Order No. 3413 at 143 (Mar. 24, 2014); *Oregon LNG*, Order No. 3465 at 141 (July 31, 2014); *Cheniere Marketing, LLC*, Order No. 3638 at 205 (May 12, 2015); *Sabine Pass Liquefaction, LLC*, Order No. 3669 at 210 (June 26, 2015); *Pieridae Energy (USA), LTD.*, Order No. 3768 at 216 (Feb. 5, 2016); *Bear Head LNG Corp.*, Order No. 3770 at 176 (Feb. 5, 2016); *Venture Global Plaquemines LNG, LLC*, Order No. 4446, at 42 (Oct. 16, 2019); *Venture Global Calcasieu Pass, LLC*, DOE/FE Order No. 4346, Docket No. 15-25-LNG at 69; CP2 LNG Final Non-FTA Order, *supra* n.9, at 59; *Venture Global Plaquemines LNG, LLC*, DOE/HGEO Order No. 4446-B, at 55 (Mar. 13, 2026).

[44] *E.g., Philips Alaska*, DOE/FE Order No. 1473 at 14; *Yukon Pacific Corp.*, DOE/FE Order No. 350, 1 FE ¶ 70,259 at 71,128 (1989); *Dominion Cove Point LNG, LP*, DOE/FE Order No. 3331 at 8 (Sept. 11, 2013); *Sierra Club, et al.*, Order Denying Petition for Rulemaking on Exports of Liquefied Natural Gas, at 10 (July 18, 2023).

[45] *Policy Guidelines and Delegation Orders Relating to the Regulation of Imported Natural Gas*, 49 Fed. Reg. 6,684 (Feb. 22, 1984).

[46] *Id.*

[47] *Id.* at 6,685 and 6,687. The parenthetical references to exports are added in the above quotation to reflect the applicability of the Policy Guidelines to exports. *See supra* n.44.

As DOE has frequently explained: "The goals of the Policy Guidelines are to minimize federal control and involvement in energy markets and to promote a balanced and mixed energy resource system."[48] DOE has promoted the competitive, free-trade policies embodied in the Policy Guidelines by consistently authorizing LNG exports to non-FTA nations, in over 40 decisions issued by multiple Administrations over more than a decade for aggregate authorized exports to non-FTA nations (were all the authorized projects actually placed in service[49]) totaling approximately 53.72 Bcf per day.[50] DOE/HGEO should continue to follow its longstanding practice in granting the Application here.

While NGA section 3(a) establishes a broad public interest standard and a presumption favoring export authorizations, the statute does not define "public interest" or identify the criteria that must be considered. In its orders authorizing long-term LNG exports to non-FTA nations, DOE has been guided by DOE Delegation Order No. 0204-111, which directed that regulation of gas exports be "based on a consideration of the domestic need for the gas to be exported and such other matters as the Administrator finds in the circumstances of a particular case to be appropriate."[51] More specifically, DOE has explained that its review of export applications

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[48] *E.g., Sabine Pass Liquefaction, LLC*, DOE/FE Order No. 2961 at 29 (May 20, 2011); *Venture Global Plaquemines LNG, LLC*, Order No. 4446, at 19 (Oct. 16, 2019); CP2 LNG Final Non-FTA Order, *supra* n.9, at 26-27.

[49] Of course, as DOE has explained "it is far from certain that all or even most of the proposed LNG export projects will ever be realized because of the time, complexity, and expense of commercializing, financing, and constructing LNG export terminals, as well as the uncertainties inherent in the global market demand for LNG." Term Extension Policy Statement, 85 Fed. Reg. 52,237, 52,243 (Aug. 25, 2020) (Policy Statement subsequently rescinded).

[50] A list of all the non-FTA approvals with docket numbers, volumes, and links to the relevant DOE/FE orders is *available at* https://www.energy.gov/fe/downloads/summary-lng-export-applications-lower-48-states. *See also Sierra Club, et al.*, Order Denying Petition for Rulemaking on Exports of Liquefied Natural Gas, at 15 (July 18, 2023); and *Venture Global Plaquemines LNG, LLC*, DOE/HGEO Order No. 4446-B, at 55-60 (Mar. 13, 2026) (recent listing of all non-FTA authorizations and cumulative volumes).

[51] DOE Delegation Order No. 0204-111 (Feb. 22, 1984) at 1 (¶ b); *see also Policy Guidelines and Delegation Orders Relating to the Regulation of Imported Natural Gas*, 49 Fed. Reg. at 6,690.

focuses on: (i) the domestic need for the natural gas proposed 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's policy of promoting market competition; and (iv) any other factors bearing on the public interest.[52]

Granting CP2 LNG's request to increase its authorized quantity of LNG exports will be consistent with, and indeed advance, the public interest. DOE has already authorized exports of LNG to non-FTA nations by CP2 LNG as not inconsistent with the public interest in two orders issued in 2025. Authorizing an increase in the export volumes from the Terminal in connection with the CP2 LNG Expansion Project should be authorized for the same reasons as the prior authorizations.

Furthermore, the general benefits of LNG exports are well known to DOE and have been explained in numerous DOE orders, as well as demonstrated in a series of studies over the years. In 2012, 2015, and again in 2018, DOE released studies assessing the macroeconomic impacts of LNG exports to inform its decisions on applications seeking authorization to export LNG to non-FTA nations.[53] The conclusions of those studies have been uniformly supportive of the public interest in LNG exports, and have been relied upon in DOE's uniform policy of authorizing non-FTA exports over many years.

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[52] *See, e.g., Venture Global Plaquemines LNG, LLC*, Order No. 4446 at 20 (Oct. 16, 2019); *Venture Global Calcasieu Pass*, *LLC*, DOE/FE Order No. 4346 at 21; CP2 LNG Final Non-FTA Order, *supra* n.9, at 27; *Venture Global Plaquemines LNG, LLC*, DOE/HGEO Order No. 4446-B, at 23 (Mar. 13, 2026).

[53] All three studies are available on DOE's website at: https://www.energy.gov/fecm/articles/lng-export-studies.

When it previously authorized non-FTA exports by CP2 LNG's affiliate Plaquemines LNG, for instance, DOE described its 2018 Study[54] in detail as part of its analysis authorizing the exports.[55] Among the "key findings" of that study highlighted in that order were the following:[56]

- "Increasing U.S. LNG exports under any given set of assumptions about U.S. natural gas resources and their production leads to only small increases in U.S. natural gas prices."
- "Increased exports of natural gas will improve the U.S. balance of trade and result in a wealth transfer into the United States."
- "Overall [U.S.] GDP improves as LNG exports increase for all scenarios with the same U.S. natural gas supply condition."
- "There is no support for the concern that LNG exports would come at the expense of domestic natural gas consumption."
- "[A] large share of the increase in LNG exports is supported by an increase in domestic natural gas production."
- "Natural gas intensive [industries] continue to grow robustly at higher levels of LNG exports, albeit at slightly lower rates of increase than they would at lower levels."

In December 2024, DOE issued a new study intended as a comprehensive update of its prior LNG studies.[57] In announcing DOE's Response to Comments following public comment on the 2024 Export Study, Energy Secretary Wright said: "The facts are clear: expanding America's LNG exports is good for Americans and good for the world."[58] The then Principal Deputy

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54 The 2018 Study is available at: https://fossil.energy.gov/app/docketindex/docket/index/10, and DOE's response to comments on it and summary of its conclusions was published in the Federal Register on December 28, 2018. *Study on Macroeconomic Outcomes of LNG Exports: Response to Comments Received on Study*, 83 Fed. Reg. 67,251 (Dec. 28, 2018).

55 *See Venture Global Plaquemines LNG, LLC*, Order No. 4446 at 7-14 (Oct. 16, 2019).

56 *Id.* at 13 (footnotes within the quotations, with citations to the 2018 Study omitted).

57 *See* Notice of Availability of the 2024 LNG Export Study: Energy, Economic, and Environmental Assessment of U.S. LNG Exports and Request for Comments, 89 Fed. Reg. 104,132 (Dec. 20, 2024).

58 DOE Press Release, "DOE FINALIZES 2024 LNG EXPORT STUDY, PAVING WAY FOR STRONGER AMERICAN ENERGY EXPORTS," May 19, 2025, *supra* n.22.

Assistant Secretary of DOE added that "[t]he 2024 Study confirms what our nation always knew—LNG supports our economy, strengthens our allies, and enhances national security."[59] In the DOE Response to Comments itself, DOE made the following Key Findings that are relevant to new export authorizations:

> "1. U.S domestic natural gas supply is sufficient to meet domestic and market-based global demand for U.S. natural gas (including LNG).
>
> 2. Increasing U.S. LNG exports increases U.S. GDP.
>
> 3. Higher levels of U.S. LNG exports will have a beneficial impact on the U.S. trade balance.
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> 4. Increased LNG exports are projected to have relatively modest impacts on prices and there has not been a consistent effect of U.S. LNG exports on prices to date. The potential price impacts from increased LNG exports modeled in the 2024 Study are within the range of prices observed over the past five years, and those price impacts are below the price increases from U.S. LNG exports modeled in DOE's 2018 LNG Export Study.
>
> 5. Increased U.S. LNG exports would enhance national and energy security for the United States, as well as U.S. allies and trading partners.
>
> 6. Natural gas production and the development of natural gas export infrastructure provide economic support to the communities in which they occur, including increased levels of employment."[60]

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[59] *Id.*

[60] DOE Response to Comments, *supra* n.22, at 46-47. Other Key Findings summarized there related to environmental issues. DOE/HGEO subsequently has explained on its website, however, that "in pending and future export application proceedings under NGA section 3(a), DOE will not consider the environmental analysis in the 2024 LNG Export Study or the related Response to Comments." *See* https://fossil.energy.gov/app/docketindex/docket/index/30 (citing for further discussion of this approach, *e.g.*, *Venture Global Calcasieu Pass, LLC*, DOE/FECM Order No. 4346-B, Docket No. 15-25-LNG at 12-13, 15-16, 36-38).

Stating DOE's conclusion most generally, it found that "the record evidence from 2024 LNG Export Study and the public comments received support the proposition that exports of LNG from the United States will not be inconsistent with the public interest."[61]

Given this recent DOE conclusion and the findings and extensive evidence demonstrating the benefits of LNG exports provided in the DOE Response to Comments on the 2024 Study and its recent orders (including both the conditional and final order authorizing non-FTA exports by CP2 LNG), little additional support is required to bolster this Application. Nevertheless, CP2 LNG will briefly reiterate some of the key factors showing the public interest in LNG exports.

1. Natural Gas Supply Is Ample for LNG Exports, As Well As Domestic Needs

The primary focus of the DOE's public interest analysis is on the domestic need for the LNG proposed to be exported. This domestic need can be analyzed by comparing the domestic natural gas supply against natural gas demand.

Domestic natural gas resources are abundant, affordable, and sufficient to meet both the domestic consumption demand and any expected level of LNG exports, including the increased volumes proposed for export by CP2 LNG, in the long-term. Technological developments in the natural gas industry have led to significant increases in domestically produced natural gas, especially with regard to non-conventional production of natural gas from onshore shale formations.

The tremendous growth in natural gas production in recent years is well-known. In 2005 – just before the shale gas renaissance – U.S. dry natural gas marketed production was just slightly more than 18 trillion cubic feet ("Tcf"), according to data from the U.S. Energy Information

[61] DOE Response to Comments, *supra* n.22, at 50.

Administration ("EIA").[62] In contrast, in each year from 2022 through 2025, domestic dry gas production exceeded 36.25 Tcf, *i.e.*, more than twice the 2005 production level.[63] Natural gas production has continued to increase in 2026, with production increases year over year for 13 straight months through April 2026 (the latest month available).[64]

The latest EIA data and projections also show U.S. natural gas production continuing to increase long-term, while domestic consumption is projected to decrease over time. The reference case in EIA's 2026 Annual Energy Outlook ("AEO 2026") projects that total U.S. dry gas production will increase to 52.83 Tcf in 2050, growing by an average amount of 1.2% per year from 2025-50.[65] The AEO 2026 projects total natural gas consumption to increase more slowly, by an average of 0.7% per year over that time period, resulting in 2050 projected consumption of 39.43 Tcf.[66]

The growing natural gas supply surplus supports the conclusion that LNG exports remain consistent with the public interest. Notably, the projections in AEO 2026 are even more supportive of LNG exports than the AEO 2017 data that was relied upon in DOE's 2018 Study that recognized the public interest benefits of LNG exports at unconstrained levels. For example, for the year 2050, the AEO 2017 reference case projected domestic production in 2050 of nearly the same as the AEO 2025 projection (at 40.28 Tcf), but it projected total consumption of 34.52 Tcf, about 4.3

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62 *See* EIA Natural Gas Data, *available at* http://www.eia.gov/dnav/ng/hist/n9070us2A.htm.

63 *Id.* (showing production of about 36.25 Tcf in 2022, 37.65 Tcf in 2023, 37.72 Tcf in 2024, and 39.29 in 2025).

64 *See* EIA Natural Gas Monthly, *available at* https://www.eia.gov/naturalgas/monthly/ (with data through April 2026, released June 30, 2026).

65 EIA, AEO 2026 Counterfactual Baseline Case, Table 13 *Natural Gas Supply, Disposition, and Prices*, *available at* https://www.eia.gov/outlooks/aeo/data/browser/#/?id=13-AEO2026&cases=cb2026&sourcekey=0.

66 *Id.*

Tcf more than the latest projections.[67] DOE/HGEO has repeatedly conducted this same sort of analysis, comparing the AEO 2017 to the then-current AEO data in its orders authorizing non-FTA exports that reaffirmed the soundness of the 2018 Study,[68] as well as its even more recent orders taking into consideration the strong conclusions of the 2024 Study regarding the public interest benefits of LNG exports.[69]

At the same time that natural gas production has grown significantly, proven reserves have dramatically increased as well. EIA's latest data actually shows a decrease in total proved natural gas reserves for 2024 (the latest year available) compared to the prior two years but remaining at 583.9 Tcf.[70] In comparison, EIA data showed proved reserves of 324.3 Tcf at year-end 2016 (less than half the current level), even after increasing by more than 50% over the prior decade, from a nadir of less than 200 Tcf.[71] Thus, the proved natural gas reserves have significantly increased over the period that the U.S. has been exporting LNG. This evidence further supports and strengthens the conclusion that the U.S. has ample gas for both all domestic natural gas use and LNG export demand.

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67 *See* Table 13 for AEO 2017, *available at* https://www.eia.gov/outlooks/aeo/data/browser/#/?id=13-AEO2017&cases=ref2017&sourcekey=0.

68 *See, e.g., Sabine Pass Liquefaction, LLC*, DOE/FE Order No. 4800 at 54-55 (Mar. 16, 2022); *Cheniere Marketing LLC & Corpus Christie Liquefaction, LLC*, DOE/FE Order No. 4799 at 53 (Mar. 16, 2022); *Freeport LNG Expansion, L.P.*, *et al.*, Order No. 4961 at 56-57 (Mar. 3, 2023).

69 *E.g.,* CP2 LNG Final Non-FTA Order, *supra* n.9, at 45-46; *Corpus Christie Liquefaction, LLC; CCL Midscale 8-9, LLC*, DOE/HGOE Order No. 5319 at 40-42 (Feb. 26, 2026); *Venture Global Plaquemines LNG, LLC*, DOE/HGEO Order No. 4446-B, at 43-44 (Mar. 13, 2026).

70 *See* EIA, U.S. Crude Oil and Natural Gas Proved Reserves, Year-end 2024 (released Apr. 7, 2026), *available at* https://www.eia.gov/naturalgas/crudeoilreserves/.

71 The EIA source cited above no longer provides historical reserve data from prior to 2020. For the EIA data as of the end of 2016, and the 50% increase in the decade before that, *see* EIA, U.S. Crude Oil and Natural Gas Proved Reserves, Year-end 2016 (released Feb. 2018), at 2 (summary), *available at* https://www.ourenergypolicy.org/wp-content/uploads/2018/02/U.S.-Crude-Oil-and-Natural-Gas-Proved-Reserves.pdf.

Furthermore, as a result of the increasing production and abundant reserves, domestic natural gas prices have remained relatively low as natural gas exports have increased significantly. As DOE/HGEO has recognized, while price projections at the time of its 2018 Study projected a 2050 Henry Hub price of $6.40/MMBtu, more current data from AEO 2024 projected that price to be $4.62/MMBtu (with both prices adjusted for 2022 dollars for comparison).[72] The more recent AEO 2026 very similarly projects a 2050 Henry Hub price of $4.64/MMBtu.[73] Thus, more current EIA pricing data are even more supportive of LNG exports than previous data and continue to demonstrate that arguments against LNG exports based on misplaced concerns about insufficient supplies or domestic natural gas prices are baseless. As DOE explained in its Response to Comments, "[g]iven that authorizations for export extend over several decades and planning for new facilities takes several years, DOE expects that production volumes in the U.S. will increase in response to increased LNG exports, minimizing the potential for LNG exports to lead to price spikes."[74] Accordingly, as DOE properly concluded after intensive focus on this issue as part of the 2024 Study and comments on it:

> Increased LNG exports are projected to have relatively modest impacts on prices and there has not been a consistent effect of U.S. LNG exports on prices to date. The potential price impacts from increased LNG exports modeled in the 2024 Study are within the range of prices observed over the past five years, and those price impacts are below the price increases from U.S. LNG exports modeled in DOE's 2018 LNG Export Study.[75]

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[72] CP2 LNG Final Non-FTA Order, *supra* n.9, at 46; *Corpus Christie Liquefaction, LLC; CCL Midscale 8-9, LLC*, DOE/HGOE Order No. 5319 at 41 (Feb. 26, 2026); *Venture Global Plaquemines LNG, LLC*, DOE/HGEO Order No. 4446-B, at 43 (Mar. 13, 2026).

[73] EIA, AEO 2026 Counterfactual Baseline Case, Table 13 *Natural Gas Supply, Disposition, and Prices*, *available at* https://www.eia.gov/outlooks/aeo/data/browser/#/?id=13-AEO2026&cases=cb2026&sourcekey=0.

[74] DOE Response to Comments, *supra* n.22, at 18-19.

[75] *Id.* at 46.

Looking to the most recent EIA price projections in the most recent Short-Term Energy Outlook (STEO) for June 2026, Henry Hub prices are projected to average $3.34/MMBtu for the second half of 2026 and $3.46/MMBtu in 2027.[76] Notably, these latest price projections are notably lower than those from the March STEO just cited by DOE in a recent export authorization,[77] further bearing out the point noted by DOE there that "EIA also observes that a recent global supply disruption for LNG is not expected to impact domestic natural gas prices: 'Although reduced liquefied natural gas (LNG) flows through the Strait of Hormuz have caused the price of natural gas in Europe and Asia to increase, we expect U.S. natural gas prices to be relatively unaffected by this development.'"[78]

In summary, just as DOE has repeatedly and consistently found in its many long-term non-FTA export authorizations, there are adequate natural gas resources in the U.S. to meet demand associated with LNG exports as well as all domestic needs. Accordingly, granting the increased volume of authorized exports requested by CP2 LNG to non-FTA nations is unlikely to affect the availability of natural gas to domestic consumers or to have negative economic effects. To the contrary, the proposed LNG exports will provide net economic benefits to the U.S., regardless of the amount of LNG that is exported by others.

2. CP2 LNG's Increased Exports Will Provide Macro-Economic Benefits

Another issue in the 2024 Study that DOE considered and commented on was the macroeconomic effects of LNG exports. DOE concluded that increasing LNG exports results in

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[76] U.S. Energy Info. Admin., Short-Term Energy Outlook ("STEO") (June 2026) at 11, *available at* https://www.eia.gov/outlooks/steo/pdf/steo_full.pdf.

[77] *Venture Global Plaquemines LNG, LLC*, DOE/HGEO Order No. 4446-B, at 43 & n. 242 (Mar. 13, 2026)(citing projected average Henry Hub prices of $3.76/MMBtu and $3.85/MMBtu for 2026 and 2027 respectively).

[78] *Id.* at 43 & n.243 (quoting from the March 2026 STEO).

an increase to U.S. GDP in all cases examined and across the range of all scenarios analyzed, with an estimated $410 billion cumulatively for the period 2020 through 2050 under the Reference case.[79] Furthermore, DOE concluded that higher levels of U.S. LNG exports will provide additional economic benefits through improvements to the U.S. trade balance, increased federal and state tax revenues, and increased jobs.[80]

Of course, DOE has consistently concluded in its non-FTA orders over many years that LNG exports will have macro-economic benefits. These general conclusions about the benefits of LNG exports equally apply to the CP2 LNG Expansion Project. In particular, the Project will benefit the economy by creating good-paying jobs, reducing the nation's trade deficit, and increasing tax revenues.

The proposed CP2 LNG Expansion Project's estimated cost exceeds $10 billion, adding to the more than $30 billion already being spent on the previously authorized CP2 LNG Terminal. The proposed CP2 LNG Expansion Project is expected to require a peak workforce of up to 3,000 workers on site for approximately six months. Over an approximately three-year construction period, the construction workforce will typically average 1,600 workers for the Terminal Expansion and an additional average of 175 workers for the CP Express Expansion, with an estimated average annual salary of $150,000. The Project is projected to result in the permanent hiring of approximately 150 workers. Construction and related activities also will create business opportunities for local suppliers and service providers, likely boosting supply chain revenues and supporting job growth in related industries.

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79 *Id.* at 49.

80 *Id.* at 48.

The Project's construction labor expense will amount to hundreds of millions of dollars and will further generate income taxes at the state level. Additionally, a portion of the construction payroll will be spent locally by both local and non-local workers. While it is difficult to predict the level of worker or Project spending that will be subject to sales tax, the amount will result in a noticeable infusion of tax revenue into the local economy. In total, the Project is estimated to generate more than $1.8 billion in net new local tax revenue from the start of construction through the estimated 20-year lifespan of the Project and to generate more than $460 million in net new, direct tax revenue for the State of Louisiana during the same time. Thus, with addition of the Expansion Project proposed here, the CP2 LNG Terminal will produce enormous economic and tax benefits to Cameron Parish and the State of Louisiana.

In addition to jobs and taxes, LNG exports also will help realign the U.S. balance of trade. As DOE observed when previously authorizing non-FTA exports by CP2 LNG:

> even beyond the multibillion dollar economic investment and jobs created from constructing the CP2 LNG Project, a similar size project exporting at its peak capacity for one year (3.96 Bcf/d or 1,446 Bcf/yr) could reduce the trade deficit by up to approximately $9.3 billion annually based on observed average U.S. LNG export prices for January through December 2024. Further, the increased value of CP2 LNG's exports would spur other domestic economic activity and benefits, including the potential for supporting upstream production and related employment.[81]

That calculation, of course, related to the previously authorized exports of approximately 28 MTPA;[82] the incremental exports of another 620.5 Bcf of natural gas per year (equivalent to about 11.7 MTPA) would increase those benefits proportionately.

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[81] CP2 LNG Final Non-FTA Order, *supra* n.9, at 50-51 (internal footnotes and citations omitted).

[82] As previously explained, CP2 LNG submitted applications to both FERC and DOE for limited amendments of its authorizations to increase the CP2 LNG Terminal's peak achievable capacity from 28 MTPA to 35 MTPA.

3. LNG Exports Provide Geopolitical Benefits

In considering the international consequences of LNG exports in its prior orders, DOE has consistently recognized the geopolitical benefits of LNG exports. In its non-FTA authorization for Plaquemines LNG, for instance, DOE explained:

> an efficient, transparent international market for natural gas with diverse sources of supply provides both economic and strategic benefits to the United States and our allies. Indeed, increased production of domestic natural gas has significantly reduced the need for the United States to import LNG. In global trade, LNG shipments that would have been destined to U.S. markets have been redirected to Europe and Asia, improving energy security for many of our key trading partners. To the extent U.S. exports can diversify global LNG supplies and increase the volumes of LNG available globally, these exports will improve energy security for many U.S. allies and trading partners.[83]

In its order authorizing non-FTA exports for CP2 LNG last year, DOE reached the same conclusion[84] and added the following more current observations:

- in light of the 2022 Russian invasion of Ukraine, there continue to be concerns about energy security for Europe and Central Asia, particularly given the relative share of Russian natural gas supplied to those regions until recently, with continued risk due to the now-expired agreement for the supply of Russian natural gas to Europe.[85]

- Further, the European Commission recently proposed a legally binding ban on European Union (EU) imports of Russian natural gas by the end of 2027, and signaled that, to replace Russian supplies, the EU "could import more U.S. LNG" among other measures.[86]

- Further, the United States has an increasingly important role in the EU's natural gas supply. As the agreement allowing the transit of Russian natural gas through Ukraine expired at the end of 2024, "[i]ncreasing LNG imports from trustworthy global partners is key

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83 *Venture Global Plaquemines LNG, LLC*, Order No. 4446, at 37 (Oct. 16, 2019).

84 CP2 LNG Final Non-FTA Order, *supra* n.9, at 53.

85 *Id.* at 51 (internal footnotes and citations omitted).

86 *Id.* at 52 (footnote and citation omitted).

> to fully eliminating the EU's reliance on Russian fossil fuels." According to the EU, "[e]ach step to phase out Russian fossil fuels brings the EU closer to a more secure and sustainable energy supply."[87]

- Additionally, we take administrative notice of a report published in October 2024 by the Institute of Energy Economics, Japan (IEEJ), which found that "[g]lobal LNG demand in 2050 is projected to increase by 74% from the present level." According to the IEEJ, "[o]ne of the focal points of increasing demand is Southeast Asia's emerging markets, notably the power generation sector," and "[i]f the energy efficiency improvements assumed in these scenarios are not realized, LNG demand would increase further." Similarly, other forecasts project varying levels of global demand for LNG, with many analysts predicting moderate to significant growth in LNG demand globally, particularly driven by Asia.[88]

In an even more recent order authorizing increased exports from Plaquemines LNG in March 2026, DOE/HGEO added further:

> In recent weeks, the global supply of LNG has been significantly impacted from the developments in the Middle East. . . . The need for additional U.S. LNG supplies from operating facilities like the Plaquemines LNG Project that can be deployed immediately are essential to supplying the global LNG market.[89]

While the CP2 LNG Expansion Project will not provide incremental exports to the global LNG market as quickly at the authorized uprate of Plaquemines LNG, the same conclusion applies that CP2 LNG's increased exports will help mitigate energy concerns and improve energy security for many U.S. allies and trading partners.[90]

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87 *Id.* at 53-54 (footnotes and citations omitted).

88 *Id.* at 54 (footnotes and citations omitted).

89 *Venture Global Plaquemines LNG, LLC*, DOE/HGEO Order No. 4446-B, at 49 (Mar. 13, 2026) (internal footnotes and related citations omitted).

90 *See id.* at 50.

Indeed, all DOE's prior conclusions concerning the geopolitical benefits of U.S. LNG exports are equally applicable to the increased volume of LNG exports proposed by CP2 LNG here. Accordingly, these geopolitical and energy security considerations further support the requested non-FTA authorization. Given the worldwide need for additional gas supplies, DOE/HGEO should continue here its long-standing policy of authorizing LNG exports.

4. LNG Exports Provide Environmental Benefits

Current DOE policy does not focus on environmental issues as part of its non-FTA export decisions. Nevertheless, because the issue has received focus in the past, CP2 LNG submits that exporting natural gas also will benefit the United States internationally because it will encourage the use of more environmentally friendly natural gas for the generation of electricity as opposed to coal, diesel, or heavy fuel oil used in foreign countries.

The increased use in the U.S. of natural gas for power generation in place of coal in recent years has resulted in decreased carbon dioxide ("CO_2") emissions. For instance, between 2005 and 2019, total U.S. electricity generation increased by almost 2% while related CO_2 emissions fell by 33%. The majority of the CO_2 emissions reduction resulted from the substitution of coal with natural gas for electric generation.[91] EIA has emphasized the key role of natural gas in reducing U.S. carbon emissions.[92] Additional LNG exports from the U.S. may similarly substitute

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[91] EIA, "U.S. Energy-Related Carbon Dioxide Emissions," released Sept. 30, 2020, *available at* https://www.eia.gov/environment/emissions/carbon/#:~:text=EIA%20calculated%20that%20between%202005,carbon%20generation%20totaled%205%2C475%20MMmt.&text=Between%202005%20and%202019%2C%20total,CO2%20emissions%20fell%20by%2033%25.

[92] *See, e.g.,* EIA, Today in Energy, "Electric power sector CO_2 emissions drop as generation mix shifts from coal to natural gas" (June 9, 2021) ("Although both the increased use of renewables and the shift from coal-fired to natural gas-fired generation contributed to reductions in electric power sector CO_2 emissions, the shift from coal to natural gas had a larger effect."), *available at* https://www.eia.gov/todayinenergy/detail.php?id=48296#; EIA, Today in Energy, "U.S. energy-related CO_2 emissions expected to rise slightly in 2018, remain flat in 2019" (Feb. 8, 2018) ("The underlying energy consumption trends that resulted in these changes—mainly because more electricity has been generated from natural gas than from other fossil fuels—have helped to lower the U.S. emissions level since 2005

for coal, or fuel oil, usage overseas, and support the deployment of renewable energy, thereby sharing the environmental benefits of natural gas with other nations, enabling efforts to reduce CO_2 emissions.

When DOE in 2014 issued its study of the "Life Cycle Greenhouse Gas Perspective" (which compared the greenhouse gas ("GHG") emissions from power generation in Europe and Asia using exported U.S. LNG with the GHG emissions from power generated using local hydrocarbon resources),[93] it concluded that "we see no reason to conclude that U.S. LNG exports will increase global GHG emissions in a material or predictable way."[94] DOE updated that study in 2019,[95] again comparing life cycle GHG emissions from U.S. LNG exports to regional coal and other imported natural gas for electric power generation in Europe and Asia. In its response to comments on that study issued on January 2, 2020,[96] DOE concluded that "natural gas is one part of an environmentally preferable global energy portfolio" and reiterated that the 2019 GHG Study, like the studies before it, "supports the proposition that exports of LNG from the lower-48 states will not be inconsistent with the public interest."[97]

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because natural gas is a less carbon-intensive fuel than either coal or petroleum."), *available at* https://www.eia.gov/todayinenergy/detail.php?id=34872.

[93] DOE, DOE/NETL-2014/1649, *Life Cycle Greenhouse Gas Perspective on Exporting Liquefied Natural Gas from the United States* (May 14, 2014) (hereinafter, the "2014 GHG Study"), *available at* http://www.energy.gov/sites/prod/files/2014/05/f16/Life%20Cycle%20GHG%20Perspective%20Report.pdf.

[94] *See, e.g., Venture Global Plaquemines LNG, LLC*, Order No. 4446 at 41 2 (Oct. 16, 2019); *Venture Global Calcasieu Pass*, *LLC*, DOE/FE Order No. 4346, Docket No. 15-25-LNG, at 69. Identical or very similar statements regarding the 2014 GHG Study are included in numerous other DOE orders.

[95] DOE, DOE/NETL-2019/2041, *Life Cycle Greenhouse Gas Perspective on Exporting Liquefied Natural Gas from the United States: 2019 Update* (Sept. 12, 2019), *available at* https://fossil.energy.gov/app/docketindex/docket/index/21.

[96] *Life Cycle Greenhouse Gas Perspective on Exporting Liquefied Natural Gas From the United States: 2019 Update—Responses to Comments*, 85 Fed. Reg. 72 (Jan. 2, 2020).

[97] *Id*. at 86.

DOE also considered this issue in its 2024 Study, although it has subsequently decided that the issue is not relevant to its non-FTA authorizations, which will focus only on the economic and energy security aspects of the 2024 Study.[98] For completeness regarding this issue, however, CP2 LNG notes DOE's conclusion that "Increased U.S. exports of LNG are more likely to displace other sources of natural gas, along with coal and oil, than to replace renewable energy" and, furthermore, that "If U.S. LNG exports more than triple from current levels and reach the model-resolved level of exports, 56.3 Bcf/d, the cumulative increase in global GHG emissions to 2050 would be no greater than 0.1%...[and g]iven the uncertainties inherent in modeling the global energy system, DOE cannot conclude that the change in GHG emissions would be significantly different from zero."[99] Thus, lest there be any doubt on this score, these well-reasoned conclusions by DOE rebut any potential claim that GHG emissions would render LNG exports contrary to the public interest.

VI. REVIEW OF PROJECT ENVIRONMENTAL IMPACTS

In its most recent non-FTA export authorizations, DOE/HGEO has applied a categorical exclusion from the National Environmental Policy Act of 1969, 42 U.S.C. § 4321, *et seq*. ("NEPA").[100] That approach is based on the conclusion – particularly in light of the Supreme Court's holdings in *Department of Transportation v. Public Citizen*, 541 U.S. 752 (2004), and

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98 DOE/HGEO has explained on its website that "in pending and future export application proceedings under NGA section 3(a), DOE will not consider the environmental analysis in the 2024 LNG Export Study or the related Response to Comments." *See* https://fossil.energy.gov/app/docketindex/docket/index/30 (citing for further discussion of this approach, *e.g.*, *Venture Global Calcasieu Pass, LLC*, DOE/FECM Order No. 4346-B, Docket No. 15-25-LNG at 12-13, 15-16, 36-38).

99 DOE Response to Comments, *supra* n.22, at 46-47.

100 *See, e.g.,* CP2 LNG Final Non-FTA Order, *supra* n.9, at 13-15, 55-57; *Venture Global Calcasieu Pass, LLC*, DOE/FECM Order No. 4346-B, at 12-13, 15-16, 36-38 (Aug. 4, 2025), *reh'g denied*, Order No. 4346-C (Oct. 3, 2025); *Commonwealth LNG, LLC*, DOE/FECM Order No. 5238-A, at 39-41 (Aug. 29, 2025); *Corpus Christie Liquefaction, LLC; CCL Midscale 8-9, LLC*, DOE/HGOE Order No. 5319 at 11-12, 48-51 (Feb. 26, 2026); *Venture Global Plaquemines LNG, LLC*, DOE/HGEO Order No. 4446-B, at 13-15, 51-55 (Mar. 13, 2026).

Seven County Infrastructure Coalition v. Eagle County, Colorado, 145 S.Ct. 1497 (2025) – that the only reasonably foreseeable environmental impacts associated with *DOE's decision* to authorize exports are those associated with the transportation of natural gas by marine vessel.[101] Furthermore, based on its prior analysis, DOE has concluded that "marine transport from DOE's actions does not have the potential to markedly affect the global environmental impacts associated with the commercial shipping industry," and has established a categorical exclusion from NEPA for such marine transportation given that it does not normally pose the potential for significant environmental impacts.[102] Thus, consistent with its recent practice, DOE may apply its NEPA categorical exclusion to the non-FTA portion of this Application and need not consider any other potential environmental impacts under NEPA.

Furthermore, in its order denying requests for rehearing of its existing non-FTA export authorization for CP2 LNG, DOE/HGEO after detailing the reasons for applying the categorical exclusion, DOE/HGEO added the following observation:

> Assuming, arguendo, both that DOE has authority to consider all of the environmental effects that Sierra Club asserts, and such effects are reasonably foreseeable from an authorization and require consideration by DOE, we still would determine that CP2 LNG's proposed exports are consistent with the public interest Congress seeks to advance through NGA section 3(a). Weighing the findings of the Technical Support Document, the actions of other federal and state agencies to regulate, permit, and mitigate environmental impacts such as those cited by [project opponents], and the findings of DOE's past life cycle analyses, against the economic, energy security, and other factors favoring authorization, we find that CP2

[101] *See* decisions cited in n.100.

[102] See the DOE decisions in n.100 as well as DOE, National Environmental Policy Act Implementing Procedures; Final Rule, 85 Fed. Reg. 78,197 (Dec. 4, 2020) and the related Technical Support Document, Notice of Final Rulemaking, National Environmental Policy Act Implementing Procedures (10 C.F.R. Part 1021) (Nov. 2020). *See also* 10 C.F.R. Part 1021, Subpt. D, App. B, Categorical Exclusion B5.7.

> LNG's requested non-FTA exports will advance the public interest.[103]

This same arguendo conclusion applies equally here with respect to the proposed incremental LNG exports by CP2 LNG.

Finally, CP2 LNG notes that FERC will act as the lead federal agency for the NEPA review for the siting, construction and operation of the CP2 LNG Expansion Project facilities, and DOE/HGEO may participate in that review process as a cooperating agency if it so elects. Consistent with FERC requirements, CP2 LNG will design and construct the CP2 LNG Expansion Project to minimize or mitigate adverse environmental impacts. The use of previously disturbed brownfield areas and partial integration with previously authorized facilities and utilities at the CP2 LNG Terminal will serve to further reduce Project impacts. This brownfield expansion will result in less impact to the environment than a greenfield project.

VII. APPENDICES

The following appendices are included as part of this Application:

Appendix A: Verification

Appendix B: Opinion of Counsel

VIII. CONCLUSION

WHEREFORE, for all the foregoing reasons, CP2 LNG respectfully requests that DOE/HGEO grant this application and increase the authorized volume of natural gas that may be exported from its Terminal by an additional 620.5 Bcf per year to both FTA and non-FTA nations,

[103] DOE Order No. 5265-B at 33 (Mar. 26, 2026) (internal footnotes and citations omitted); *see also Corpus Christi Liquefaction, LLC*, *et al.*, Order No. 5391 at 51 (Feb. 26, 2026) (essentially identical language).

on the terms described above, to reflect the total peak capacity of the facilities to be added in the CP2 LNG Expansion Project.

Respectfully submitted,

/s/ J. Patrick Nevins

Keith Larson
General Counsel
Venture Global LNG, Inc.
1001 19th Street North
Suite 1500
Arlington, VA 22209
Telephone: (202) 759-6736
klarson@ventureglobalLNG.com

J. Patrick Nevins
Latham & Watkins LLP
555 Eleventh Street, N.W.
Suite 1000
Washington, D.C. 20004
Telephone: (202) 637-3363
patrick.nevins@lw.com

Dated: July 7, 2026

Appendix A

VERIFICATION

STATE OF VIRGINIA)
)
) SS:
)
CITY OF ARLINGTON)

Keith Larson, being first duly sworn on his oath deposes and says: that he is the General Counsel of Venture Global LNG, Inc., and an authorized representative of Venture Global CP2 LNG, LLC; that he is duly authorized to make this Verification; that he has read the foregoing submittal and is familiar with the contents thereof; 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 the same with the U.S. Department of Energy.

Keith Larson
General Counsel

Sworn to and subscribed before me this 1st day of July, 2026.

Notary Public
In and For said City

My Commission Expires:

TRACY PELT
Notary Public
Commonwealth of Virginia
Registration No. 00359466
My Commission Expires Jun 30, 2029

Appendix B

OPINION OF COUNSEL

Opinion of Counsel

This opinion is submitted pursuant to 10 C.F.R. § 590.202(c) (2025) of the Department of Energy administrative procedures. The undersigned is General Counsel to Venture Global LNG, Inc. and an authorized representative of Venture Global CP2 LNG, LLC.

I have reviewed the corporate documents of Venture Global CP2 LNG, LLC, and it is my opinion that the proposed export of natural gas is within the company's corporate powers.

Respectfully submitted.

Keith Larson
General Counsel
Venture Global LNG, Inc.
1001 19th Street North
Suite 1500
Arlington, VA 22209
Telephone: (202) 759-6736
klarson@ventureglobalIng.com

Dated: July 1, 2026