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RECEIVED

By Docket Room at 8:08 am, Jul 24, 2026

June 25, 2026

Director, Office of Regulation, Analysis, and Engineering
U.S. Department of Energy Natural Gas Regulation
FE-34 – Room 3E-056
1000 Independence Avenue, S.W.
Washington, D.C. 20585

Re: Xpress Natural Gas LLC, Application for Long-Term Authorization to Export Compressed Natural Gas

Ladies and Gentlemen:

We have acted as counsel to Xpress Natural Gas LLC, a Delaware limited liability company (the "Company"). This opinion is being furnished to you at the Company's request pursuant to 10 C.F.R. 590.202(c) of the Department of Energy ("DOE") administrative procedures.

In rendering the opinion set forth herein, we have examined originals, or copies certified or otherwise identified to our satisfaction, of such documents, corporate records and other instruments as we have deemed necessary or appropriate for the purposes of this opinion letter, including copies of (a) the Certificate of Formation of the Company dated March 16, 2011, as amended by the certificate of amendment dated February 6, 2012, (b) the Sixth Amended and Restated Limited Liability Company Agreement of the Company dated March 9, 2021, (c) the Certificate as to the Company's legal existence and good standing issued by the Secretary of State of the State of Delaware dated June 24, 2026, and (d) the Company's Application for Long-Term Multi-Contract Authorization to Export Compressed Natural Gas by Truck from the Compression Station in Baileyville, Maine to Canada (the "Application"). We have also examined and relied upon such other matters of law, certificates of public officials and representations of officers and other representatives of the Company as we have deemed relevant, appropriate or necessary to the rendering of our opinion. We have made no independent investigation of the facts stated in such certificates or as to any information received from the Company or its representatives, and do not opine as to the accuracy of any such factual matters or make any representation as to the reasonableness of such reliance.

In rendering the opinion expressed below, we have assumed the legal capacity of all natural persons signing documents and that the signatures of persons signing all documents in connection with which this opinion letter is rendered are genuine, all documents submitted to us as originals or duplicate originals are authentic and all documents submitted to us as copies, whether certified or not, conform to authentic original documents. Additionally, we have assumed and relied upon the accuracy and completeness of all certificates and other statements, documents, records, and papers reviewed by us.

Based upon the foregoing and subject to the assumptions, qualifications and other matters set forth herein, we are of the opinion that the proposed export of compressed natural gas by the Company as described in the Application is within the limited liability company powers of the Company.

Our opinion is limited in all respects to the Delaware Limited Liability Company Act in effect as of the date hereof.

This opinion letter is for the benefit solely of DOE and not for the benefit of any other person. We are opining herein only as of the date hereof and we undertake no, and disclaim any, obligation to advise you of any changes in any matter set forth herein, regardless of whether changes in such matters come to our attention after the date hereof. No attorney-client relationship exists or has existed with DOE by reason of our preparation, execution and delivery of this opinion letter. By providing this opinion letter and permitting reliance hereon by you, we are not acting as your counsel and have not assumed any responsibility to advise you with respect to the adequacy of this opinion letter for your purposes. This opinion letter may not be relied upon by any other person or for any other purpose or used, quoted, or otherwise referred to for any other purpose.

Very truly yours,

A handwritten signature in black ink, appearing to read "Nixon Peabody LLP", is written below the closing text.