



RECEIVED

By Docket Room at 8:15 am, Sep 11, 2026

September 10, 2026

SUBMITTED ELECTRONICALLY TO FERGAS@HQ.DOE.GOV

Ms. Amy Sweeney
Division of Regulation
Office of Global Energy Security
Hydrocarbons and Geothermal Energy Office
U.S. Department of Energy
1000 Independence Avenue SW
Washington, DC 20585

Re: **Freedom LNG LLC, FE Docket No. 26-_____ -LNG
Application for Long-Term Authorization to Export Liquefied Natural
Gas to Both FTA and Non-FTA Countries**

Dear Ms. Sweeney,

Please find attached for filing the application of Freedom LNG LLC for Long-Term, Multi-Contract Authorization to Export Liquefied Natural Gas to Free Trade Agreement and Non-Free Trade Agreement Nations.

The electronic copy of the Application, submitted via e-mail, includes a copy of the \$50.00 proof of payment. Confidential documentation on site control (Attachment 3) will be submitted under seal in a separate e-mail. Freedom LNG LLC requests that Attachment 3 to the Application be afforded confidential treatment pursuant to 10 C.F.R. § 590.202(e).

Please acknowledge receipt of this Application by email to mc@lngalliance.com.
Should you have any questions, please do not hesitate to contact me at (713) 240-2631.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "R. Muthu", followed by a stylized flourish.

Muthu Chezhan

President, Freedom LNG LLC

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

Freedom LNG LLC

FE Docket No. 26-___-LNG

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

September 10, 2026

Communications regarding this application should be directed to:

Alberto Nafarrate
Freedom LNG LLC
6860 Dallas Pkwy #200
Plano, Texas 75024
Tel: 713 240-2631
anl@lngalliance.com

Muthu Chezhan
Freedom LNG LLC
6860 Dallas Pkwy #200
Plano, Texas 75024
Tel: 713 240-2631
mc@lngalliance.com

Contents

1.0	Applicant Description	4
2.0	Communications and Correspondence	5
3.0	Project Description	5
3.1	LNG Facility	5
3.2	Gas Transport to BRAVO LNG project facility	7
4.0	Requested Authorization	7
5.0	Public Interest Analysis	9
5.1	Applicable Legal Standards	9
5.1.1	FTA Nations – Standard of Review	9
5.1.2	Non-FTA Nations – Standard of Review	9
5.2	Domestic Need for the Gas to be Exported	11
5.3	Other Public Interest Considerations	16
6.0	Review of Environmental Effects	21
6.1	This Application should be subject to a Categorical Exclusion under NEPA	21
6.2	Permitting and Environmental Impact Review by The Government of Mexico	27
6.3	FERC Environmental Review	29
7.0	Appendices	29
8.0	Conclusion	30
	Attachment 1: BRAVO LNG Project Overview	31
	Attachment 2: Freedom LNG’s Organization Chart and Permits	32
	Attachment 3: Documentation on Site Control	33
	Appendix A: Legal Opinion of Counsel for Freedom LNG LLC	36
	Appendix B: Verification	38
	Appendix C: Mexico Overall Permitting Overview	40
	Appendix D: Project EIA Requirements in Mexico	48
	Appendix E: Project Operational Emissions	51

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

Freedom LNG LLC, a Texas limited liability company, (“Freedom LNG” or “Applicant”) is an energy infrastructure development company with established experience in LNG project development and integrated gas solutions. Freedom LNG hereby requests under this Application, pursuant to Section 3 of the Natural Gas Act of 1938, as amended (“NGA”) and Part 590 of the Department of Energy’s regulations, that the DOE Hydrocarbons and Geothermal Energy Office (“DOE/HGEO”) grant Freedom LNG, on its own behalf and as agent for others, long-term, multi-contract authorization to export domestically produced natural gas to Mexico and to convert such natural gas to liquefied natural gas (“LNG”) for re-export to both free trade agreement (“FTA”) and non-free trade agreement (“non-FTA”) nations, and for consumption in Mexico.

Freedom LNG seeks this long-term authorization to export via pipeline initially to Mexico up to 0.940 billion cubic feet (“Bcf”) per day of natural gas, and ultimately re-export for delivery to FTA and non-FTA countries up to 0.840 Bcf/day or approximately 307 Bcf/year of liquified natural gas (“LNG”), which is equivalent to 6.0 million tonnes per annum (“MTPA”) of LNG. These volumes include an estimated ~ 8% allocation for fuel usage and liquefaction losses, which is subject to final engineering confirmation.

Applicant requests this authorization become effective on the date of first exportation under this authorization and continue thereafter for a period of twenty (20) years.

Freedom LNG is filing this application in connection with the development of the BRAVO LNG Project, (“Project”), an LNG production, storage export facility to be located nearshore within the port (land and marine) concessions allocated to the Port of Matamoros in the State of Tamaulipas, Mexico (the “LNG Facility”). The LNG Facility will be owned and operated by Freedom LNG’s affiliate, BRAVO LNG S.A. de C.V, (“BRAVO LNG”). The Project will be developed in a modular configuration consisting of only one (1) liquefaction train, with a nominal capacity of approximately 6.0 MTPA. Once constructed, the LNG Facility will be capable of receiving, processing, and liquefying natural gas, storing the resulting LNG, and loading LNG onto LNG carriers for re-export to other countries and for delivery to markets elsewhere in Mexico.

Freedom LNG intends to aggregate most and possibly all of the LNG Facility’s natural gas feedstock during the twenty-year offtake life cycle of the LNG Facility. As part of this aggregation, Freedom LNG intends to hold title to most and possibly all of the exported gas, but also may act as the export agent for persons

delivering gas sourced from the United States, owned and delivered by such persons, to the LNG Facility as third parties. During its operation, the LNG Facility will rely on natural gas feedstock sourced from supplies imported into Mexico from the United States.

Freedom LNG expects to begin exporting natural gas to the LNG Facility in December 2030 for pre-commercial testing. Freedom LNG expects to export natural gas for re-export as LNG in July 2031 when the LNG Facility is expected to begin full commercial service. At this time, the LNG Facility is expected to produce approximately 6.0 MTPA of LNG for export.

The LNG Facility will generate substantial benefits for both the United States and Mexico. Exports of LNG from the LNG Facility will benefit U.S. natural gas producers, which through the LNG Facility will gain competitively advantaged access to new markets for the large quantities of low-cost natural gas that are readily available in, and in some cases constrained within, the Permian Basin, San Juan Basin, the Eagle Ford Formation, Barnett Shale, Haynesville, and other producing basins in the United States. Given its location on the Gulf coast of North America near Matamoros, Tamaulipas, the LNG Facility will be a cost competitive source of LNG for markets in the Caribbean, Europe, as well as, and Central and South America, and hence will offer U.S. gas supplies a durable competitive advantage in these key LNG markets.

Construction of the LNG Facility will benefit both U.S. and Mexican providers of design and construction services, construction materials and specialized equipment, as well as construction workers drawn from both U.S. and Mexican labor pools.

The LNG Facility's operation will provide needed employment to residents of the area around Matamoros in the State of Tamaulipas, Mexico. Exports of natural gas for liquefaction at the LNG Facility will directly reduce the United States' trade deficit with Mexico.

Accordingly, the LNG exports Freedom LNG seeks authorization to undertake are fully consistent with public interest from both the U.S. and Mexican perspectives. DOE/HGEO should conclude as much, and should determine that, as NGA Section 3 requires, the proposed exports are consistent with the public interest.

In support of this Application, Applicant respectfully states the following:

1.0 Applicant Description

The exact legal name of Applicant is Freedom LNG LLC, a Texas limited-liability company, with a principal place of business in Plano, Texas. Freedom LNG LLC is an affiliate of LNG Alliance Pte. Ltd., a Singapore

private limited company, and LNG Alliance Pte. Ltd. is the project development company for the LNG Facility. The LNG Facility will be owned and operated by BRAVO LNG S.A. de C.V. (or “BRAVO LNG”), Mexican Sociedad Anonima, through its subsidiaries BRAVO FLNG Barge Facility S.A. de C.V., BRAVO LNG Storage S.A. de C.V., BRAVO Maritime Facilities S.A. de C.V., and BRAVO LNG Operations S.A. de C.V., all of which are Mexican Sociedad Anonima associated project entities’ responsible for liquefaction, storage, marine infrastructure and operations respectively. Freedom LNG is affiliated through common ownership with BRAVO LNG S.A. de C.V. An organizational chart detailing these relationships is included herein as Attachment 2.

2.0 Communications and Correspondence

Communications regarding this application should be directed to:

Muthu Chezhan

Freedom LNG LLC

6860 Dallas Pkwy #200, Plano, Texas 75024

Tel: (713) 240-2631

mc@lngalliance.com

Alberto Nafarrate

Freedom LNG LLC

6860 Dallas Pkwy #200 Plano, Texas 75024

Tel: (713) 240-2631

anl@lngalliance.com

3.0 Project Description

3.1 LNG Facility

The LNG Facility’s general location is presented in the BRAVO LNG Project Overview, as included in Attachment 1.

The LNG Facility will be located within the port (land and marine) concessions allotted to the Port of Matamoros (also known as “Puerto del Norte”) in the State of Tamaulipas, Mexico, on the Gulf coast of North America.

The LNG Facility will be developed as a modular liquefaction project and will consist of one (1) liquefaction train with a nominal capacity of approximately 6.0 MTPA.

Associated facilities will include:

- (a) pretreatment and liquefaction barges (“FLNG Barges”) of approximately 6.0 MTPA capacity,
- (b) two FSUs to store the LNG produced
- (c) marine infrastructure, including wharf, mooring dolphins and breasting dolphins to tie-down the FSUs
- (d) conventional LNG carriers (“LNGCs”) up to Q-Flex-sized vessels will access the FSUs via a 15-meter-deep x 120-meter-wide navigation channel access. LNGCs will tie-down to the mooring dolphins while being loaded with LNG.

Captive power generation equipment will be located on the barges.

The FLNG Barge(s) will be constructed in a shipyard in the United Arab Emirates or Southeast Asia and delivered to the LNG Facility’s earmarked site for connectivity to a short feed gas pipeline. This feed gas pipeline will supply gas from the existing offshore Sur de Texas-Tuxpan gas pipeline.

BRAVO LNG S.A. de C.V. is in the process of securing the requisite environmental and construction permits that will authorize the construction and operation of facilities at the project site and exports of LNG from the LNG Facility, which includes permits and authorizations for preconstruction, construction, zoning, gas and LNG export from the applicable Mexican governmental agencies.

The applicable permits will be held by Freedom LNG’s affiliate, BRAVO LNG, S.A. de C.V. The LNG Facility will be constructed in phases with the initial phase of export operations commencing in July 2031.

The project will produce approximately 6.0 MTPA of LNG for export via LNG carriers to FTA Nations and non-FTA nations approved by US DOE/HGEO, and the remaining volumes, if any, will be reserved for domestic usage within Mexico. Such remaining volumes would be delivered to import terminals along Mexico’s west coast, such as the Manzanillo and Pichilingue (La Paz) terminals, or other future import terminals.

For LNG re-exported to other nations, the LNG Facility is particularly suited to re-export to the European, Caribbean, Brazilian and Argentinian markets, most of which can be supplied by a vessel from the LNG Facility without having to transit the Panama Canal.

3.2 Gas Transport to BRAVO LNG project facility

Freedom LNG intends to source natural gas produced primarily from the Permian Basin and other major U.S. producing regions. Transportation of U.S.-origin gas is planned via the existing Sur de Texas-Tuxpan pipeline, which starts near Brownsville, Texas, and runs mostly underwater through the Gulf of Mexico to Tuxpan. Tuxpan is located in the Mexican state of Veracruz. The transportation capacity of this pipeline is 2.6 Bcf/d. Applicant plans to tap into this pipeline via a ~70 km long subsea pipeline for its feed gas.

A number of prolific gas producers in the Permian basin and San Juan basin are eager to supply gas to Freedom LNG and accordingly Freedom LNG has begun negotiations with them. Presently, Freedom LNG is in the early stages of negotiating gas procurement arrangements with such gas producers and expects to initially secure up to 0.940 Bcf/day, well before commencement of the commercial service in July 2031.

4.0 Requested Authorization

Applicant respectfully requests long-term authorization to export up to 0.940 Bcf/day of natural gas to Mexico via pipeline, commencing on the date of first export under the authorizations, on its own behalf and as an agent for others.

Applicant further requests to re-export up to 307 Bcf/year (6.0 million tonnes per annum (“MTPA”)) of U.S. natural gas as LNG from Mexico to other FTA Nations and non-FTA Nations, via LNG carrier, commencing on the date of first export following the commencement of commercial operation of the project, which is currently projected to occur in July 2031. Applicant seeks such authorization in order to re-export from Mexico U.S.-sourced natural gas for which it has acquired title in the United States, as well as U.S.-sourced volumes for which it acquires title in Mexico.

Applicant requests this authorization become effective on the date of first export under this authorization and continue thereafter for a period of twenty (20) years.

Applicant further requests that DOE/HGEO permit flexibility in sourcing, transportation, and delivery arrangement and allow Applicant to act on its own behalf and as agent for others and not impose restrictions that would limit the use of future cross-border pipeline infrastructure. While Applicant anticipates that the volumes for which authorization is sought herein will be exported from the United States to Mexico via the Sur de Texas-Tuxpan pipeline system, Applicant respectfully requests that DOE/HGEO not limit its authorization in a manner that would prevent it, should the opportunity arise, from using any future cross-border natural gas pipelines which may interconnect with any pipelines to the

proposed project site. Granting such request is consistent with approvals that DOE/HGEO has issued under similar circumstances.

Applicant further requests that DOE/HGEO not require Applicant to file a subsequent application for supplemental authorization if new or expanded U.S. pipelines are constructed in the future that Applicant could use to export natural gas up to Applicant's requested export volume.

Applicant seeks to export (or re-export, as applicable) the requested volumes on its own behalf and as agent for other entities that hold title to the natural gas at the time it is exported to Mexico and/or to the U.S.-sourced natural gas at the time it is re-exported as LNG from Mexico, to the extent applicable, pursuant to long-term agreements. Applicant will comply with all DOE/HGEO requirements for exporters and agents, including all registration requirements. When acting as agent, Applicant will register with DOE/HGEO each natural gas or LNG title holder for which Applicant seeks to export as agent. Such registrations will include the registrant's agreement to comply with any order issued by DOE/HGEO under which exports are made and all applicable requirements of DOE's regulations at 10 C.F.R. Part 590, including but not limited to destination restrictions.

As noted above, Applicant may obtain title to the volumes of U.S.-sourced natural gas in the United States or in the future it may purchase natural gas in Mexico from upstream suppliers that have exported the U.S.-sourced natural gas under the supplier's own FTA export authorization or under Applicant's export authorization, with Applicant acting as agent. Applicant requests that DOE/HGEO affirm that, consistent with prior authorizations granted under similar circumstances, the registration requirements established by DOE/HGEO will apply only in circumstances where Applicant exports natural gas from the United States or re-exports LNG from Mexico on behalf of an entity that holds title to the natural gas or LNG at the time that Applicant exports it or re-exports it, respectively. If natural gas is exported or LNG is re-exported by a person or entity other than Applicant pursuant to a different authorization issued by DOE/HGEO, the terms of that other authorization will govern the registration requirements that apply.

Freedom LNG also requests authorization to use exported gas converted into LNG to serve domestic markets within Mexico. The LNG Facility will supply Mexican regional clients by LNG vessel in high gas demand areas in the neighboring Mexican states.

From the BRAVO LNG terminal, LNG will be shipped from the LNG Facility by LNG vessels to any proposed LNG import terminals on the east coast of Mexico which will have terminal-to-pipeline interconnections with existing gas pipelines in the states of Mexico along the Gulf coast.

5.0 Public Interest Analysis

5.1 Applicable Legal Standards

As DOE/HGEO has found in numerous export authorization orders issued over the recent past several years, given the abundance of the U.S. gas supply base, the excess of available gas deliverability over domestic gas demand, and the benefits associated with increased trade in natural gas, the export of natural gas from the United States is generally consistent with the public interest. The same considerations are applicable here, and they clearly support the conclusion that the export authorizations Freedom LNG requests will be consistent with the public interest. The requested authorizations accordingly should be granted under the provisions of NGA Section 3 which apply to exports of natural gas to FTA and non-FTA countries, respectively.

5.1.1 FTA Nations – Standard of Review

Section 3(c) of the NGA, as it was amended by Section 201 of the Energy Policy Act of 1992 (Pub. L. No. 102-486)¹, provides that:

[T]he 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 with the public interest, and applications for such importation or exportation shall be granted without modification or delay.

Under this statutory provision, the portion of the Application seeking authorization to export LNG to nations with which the United States currently has, or in the future may enter into, an FTA requiring national treatment for trade in natural gas, such as Mexico, is deemed to be consistent with the public interest. Accordingly, Freedom LNG requests that DOE/HGEO grant this aspect of the application without modification or delay, as it routinely does for other projects seeking authorization for export to FTA nations, consistent with the statute.

5.1.2 Non-FTA Nations – Standard of Review

DOE/HGEO is responsible for evaluating applications to export natural gas and LNG from the United States under section 3 of the NGA², pursuant to sections 301(b) and 402 of the Department of Energy Organization Act, and delegations of authority issued thereunder.

¹ Section 3(c) was added to the NGA by Section 201 of the Energy Policy Act of 1992. Energy Policy Act of 1992, Pub. L. No. 102-486, § 201, 106 Stat. 2776, 2866; 15 U.S.C. § 717b(c).

² 15 U.S.C. § 717b(a).

Export of natural gas produced in the United States to Mexico for consumption in that country is requested in this application for the purpose of use as fuel for pipeline transportation and liquefaction processes, which should be deemed in the public interest and granted without modification or delay, as required by NGA section 3(c). As clarified in Order No. 3768, the applicable legal standard for the portion of the Application that requests authorization to re-export U.S. natural gas from Mexico to non-FTA countries is set forth in section 3(a) of the NGA. The general standard for review of applications to export to non-FTA countries is established by section 3(a) of the NGA, which provides that:

*The [Secretary] shall issue such order [authorizing exports from the U.S.] upon application, unless, after opportunity for hearing, it finds that the proposed exportation or importation will not be consistent with the public interest. The [Secretary] may by its order grant such application, in whole or in part, with such modification and upon such terms and conditions as the [Secretary] may find necessary or appropriate, and may from time to time, after opportunity for hearing, and for good cause shown, make such supplemental order . . . as it may find necessary or appropriate.*³

DOE/HGEO, in applying this provision, has consistently found that section 3(a) creates a rebuttable presumption that proposed exports of natural gas are in the public interest. DOE/HGEO will grant a non-FTA export application unless there is an affirmative showing based on evidence in the record that the export would be inconsistent with the public interest.

The 1984 Policy Guidelines set forth the criteria to be employed in evaluating applications for natural gas imports.⁴ DOE/HGEO has looked into these Policy Guidelines, and has found them applicable to natural gas export applications, as well.⁵ The Policy Guidelines specify:

The market, not government, should determine the price and other

³ Id. § 717b(a).

⁴ New Policy Guidelines and Delegation Orders Relating to Regulation of Imported Natural Gas, 49 Fed. Reg. at 6,684 (Feb. 22, 1984) (“Policy Guidelines”).

⁵ *Phillips Alaska Natural Gas Corp.*, DOE/FE Order No. 1473 at 14, 42; *see also Lake Charles Exports, LLC*, DOE/FE Order No. 3324-A, at 14; *Lake Charles LNG Export Company, LLC*, DOE/FE Order No. 3868, at 12; *Cameron LNG, LLC*, DOE/FE Order No. 3846, at 11; *Sabine Pass Liquefaction, LLC*, DOE/FE Order No. 3792, at 15.

contract terms of imported [or exported] gas . . . The federal government's primary responsibility in authorizing imports [or exports] should be to evaluate the need for the gas and whether the import [or export] arrangement will provide the gas on a competitively priced basis for the duration of the contract while minimizing regulatory impediments to a freely operating market.⁶

The specific criteria that DOE/HGEO has examined while reviewing the export applications are (i) the domestic need for 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/HGEO's policy of promoting market competition; and (iv) any other factors bearing on public interest. DOE/HGEO also has identified as relevant in determining whether proposed exports are in the public interest:

- the degree to which the exports would encourage efficient management of U.S. domestic natural resources;
- whether the exports will be beneficial for the regional economies;
- the extent to which the exports will foster competition and mitigate trade imbalances with the foreign recipient nations.

As demonstrated herein, the exports proposed by Freedom LNG satisfy all applicable criteria and further the public interest.

5.2 Domestic Need for the Gas to be Exported

Adequacy of Domestic Natural Gas Supply

The United States possesses an ample and growing domestic natural gas resource base sufficient to support both rising domestic consumption and the exports proposed in this Application. According to the U.S. Geological Survey ("USGS"), the Permian Basin's Wolfcamp Shale and Bone Spring Formation alone are estimated to hold approximately 281 trillion cubic feet of undiscovered, technically recoverable

⁶ Policy Guidelines, 49 Fed. Reg. at 6,685.

natural gas.⁷ USGS's most recent assessments of the Haynesville and Bossier Formations along the Gulf Coast, updated as recently as May 2026, identify approximately 47.9 Tcf and 343.5 Tcf of additional technically recoverable natural gas, respectively, with USGS noting that the Bossier Formation alone contains resources sufficient to supply the United States for more than a decade at current consumption rates.⁸ These substantial reserves, concentrated in just two of the country's major producing basins, underscore the depth of the domestic resource base available to support increasing export volumes.

In its Annual Energy Outlook 2026 released April 8, 2026, EIA projects that U.S. natural gas production will grow significantly, from 107 billion cubic feet per day ("Bcf/d") in 2025 to between 133 and 151 Bcf/d by 2050 in most cases, driven by both domestic and international demand, including continued growth in LNG exports. Production growth is expected to be strongest in the East region, including the low-cost Appalachian Basin, supplementing continued growth from the Permian and Haynesville regions highlighted in EIA's near-term forecasts. Accordingly, the EIA's long-term projections through 2050 indicate that the requested authorization would not impair domestic supply or be inconsistent with the public interest, as U.S. natural gas production is expected to grow sufficiently, across a range of modeled scenarios, to accommodate both rising domestic consumption and increasing export demand.⁹

DOE's own 2024 LNG Export Study reaches the same conclusion: based on the complete record from the Study and the public comments received, DOE determined that the United States has a robust natural gas supply sufficient to meet growing levels of exports while minimizing impacts to domestic prices.¹⁰ Taken together, this resource base, EIA's long-term supply and price outlook, and DOE's own findings in the 2024 Study confirm that the volumes proposed for export in this Application would not impair the ability of the

⁷ U.S. Geological Survey, *Assessment of Undiscovered Continuous Oil and Gas Resources in the Wolfcamp Shale and Bone Spring Formation of the Delaware Basin, Permian Basin Province, New Mexico and Texas*, 2018, USGS Fact Sheet 2018-3073 (Dec. 2018), <https://pubs.usgs.gov/publication/fs20183073>.

⁸ U.S. Geological Survey, *Assessment of Undiscovered Oil and Gas Resources in the Haynesville Formation, Onshore Gulf of America and Adjoining State Waters* (Dec. 17, 2025), <https://www.usgs.gov/publications/assessment-undiscovered-oil-and-gas-resources-haynesville-formation-within-onshore>; U.S. Geological Survey, *Assessment of Undiscovered Oil and Gas Resources in the Bossier Formation Within the Onshore United States and State Waters of the Gulf Coast Region* (May 2026), <https://www.usgs.gov/news/national-news-release/usgs-releases-assessment-undiscovered-oil-and-gas-resources-bossier>.

⁹ U.S. Energy Information Administration, *Annual Energy Outlook 2026* (Apr. 8, 2026), <https://www.eia.gov/outlooks/aeo/>; U.S. Energy Info. Admin., Press Release, *EIA Releases the Annual Energy Outlook 2026* (Apr. 8, 2026), <https://www.eia.gov/pressroom/releases/press587.php>.

¹⁰ U.S. Department of Energy, DOE Finalizes 2024 LNG Export Study, Paving Way for Stronger American Energy Exports (May 19, 2025), <https://www.energy.gov/articles/doe-finalizes-2024-lng-export-study-paving-way-stronger-american-energy-exports>.

United States to meet its own natural gas needs, consistent with the public interest standard under NGA section 3.

Beyond the supply-adequacy findings discussed above, the Project's most significant benefit to the United States is the durable new domestic demand it will create for American natural gas. Operating at high utilization, BRAVO LNG's approximately 6 MTPA of production capacity will require roughly 0.8 Bcf/d of feed gas, or on the order of 300 Bcf annually, depending on plant efficiency. This feed gas can originate in Texas and other connected U.S. producing basins, generating revenues that flow upstream to U.S. producers, gathering and processing companies, pipeline operators, and mineral and royalty owners, and from there into federal, state, and local tax bases. This same upstream and midstream activity (gas production, gathering, compression, processing, and pipeline operations) also sustains energy-sector employment in Texas and other producing regions, extending the Project's economic benefit well beyond the plant's own workforce.

This demand builds on an already deeply integrated U.S.-Mexico natural gas market. U.S. natural gas pipeline exports to Mexico reached a record 7.9 Bcf/d in August 2026, continuing a sustained upward trend from an annual average of 6.4 Bcf/d in 2024. West and South Texas together accounted for 91 percent of U.S. pipeline exports to Mexico in 2024, reflecting the concentration of this demand in the same producing regions that would supply the Project.¹¹

Rather than requiring every incremental molecule of U.S. natural gas to reach a liquefaction terminal on U.S. soil, the Project uses this already-integrated pipeline system to reach international markets, monetizing existing cross-border infrastructure rather than requiring new capital investment in additional U.S. pipeline capacity. This also diversifies the pathways available for U.S. natural gas to reach international markets, reducing dependence on a finite number of U.S. Gulf Coast liquefaction sites and adding flexibility and redundancy to the broader U.S. LNG export network. Unlike a one-time equipment sale, the Project's 20-year LNG offtake structure would create recurring feed gas demand that supports upstream drilling, production, processing, and pipeline utilization for decades, providing a durable, long-term benefit to American energy producers and the communities and tax bases that depend on them.

Addition of Renewable Power in Texas

¹¹ U.S. Energy Information Administration, *U.S. Natural Gas Exports to Mexico Reach New Records* (Oct. 20, 2025), <https://www.eia.gov/todayinenergy/detail.php?id=66404>; U.S. Energy Info. Admin., *U.S. Natural Gas Exports to Grow Nearly 30% by 2027 as LNG Facilities Ramp Up* (Sept. 2026), <https://www.eia.gov/todayinenergy/detail.php?id=67484>.

Recent market trends show that incremental electricity demand in Texas is being addressed through substantial additions of non-gas generation capacity. The Federal Reserve Bank of Dallas reports that Texas is now the leading state for utility-scale solar generation capacity and that utility-scale solar is expected to remain an important source of new generation capacity in the state. This market-driven expansion of solar generation demonstrates that Texas electricity demand is being increasingly met through the continued buildout of alternative generation resources.¹² This trend indicates that growing electricity demand in Texas is not expected to place material additional strain on the natural gas supply available for export.

Recent EIA data reports that since 2023, wind and solar generation have been the fastest-growing sources of electricity in ERCOT and are increasingly meeting rising demand. During the first nine months of 2025, wind and solar generation supplied 36% of ERCOT's electricity demand, while natural gas-fired generation remained relatively flat from 2023 levels. EIA further notes that increased solar generation has reduced the need for natural gas-fired generation during midday hours, with the share of natural gas-fired generation at midday falling from 50% in 2023 to 37% in 2025.¹³ These trends indicate that rising electricity demand in ERCOT is being met in significant part by non-gas generation and storage resources. Accordingly, natural gas that would otherwise be consumed to meet incremental ERCOT demand remains available to support the exports proposed in this Application.

Recent EIA data also confirms that substantial additions of solar and wind capacity are expected to continue across the United States, with Texas accounting for a significant share of planned new capacity. EIA expects 2026 to be another strong year for utility-scale solar development, following record solar capacity additions of 30.8 GW in 2024 and 27.2 GW in 2025. Developers plan to add 43.4 GW of new utility-scale solar capacity in 2026, which would represent a 60% increase over 2025 additions. Texas alone accounts for approximately 40% of planned new utility-scale solar capacity in 2026, more than any other state.¹⁴ This continued, accelerating buildout of non-gas generation capacity further supports the conclusion that the requested export volumes would not impair the reliability of domestic electricity supply.

¹² Cameron Barrett, Kunal Patel & Michael Plante, Utility-Scale Solar Shines in Texas Despite Tariffs, Federal Policy Changes, Federal Reserve Bank of Dallas (Feb 3, 2026), <https://www.dallasfed.org/research/economics/2026/0203-patel-solar>.

¹³ U.S. Energy Information Administration, ERCOT Increasingly Meets Rising Demand with Solar, Wind, and Batteries, Today in Energy (Oct. 24, 2025), <https://www.eia.gov/todayinenergy/detail.php?id=66464>.

¹⁴ U.S. Energy Information Administration, Solar, Battery Storage to Lead New U.S. Generating Capacity Additions in 2026, Today in Energy (February 20, 2026), <https://www.eia.gov/todayinenergy/detail.php?id=67205>.

Wind capacity additions are also expected to increase in 2026, with EIA reporting that developers plan to add 11.8 GW of new wind capacity to the U.S. grid, more than double the capacity added in 2025. New Mexico, Texas, Illinois, and Wyoming are expected to account for nearly 60% of planned 2026 wind capacity additions.¹⁵ Taken together, these trends across solar and wind support the conclusion that domestic natural gas supply will remain sufficient to accommodate both growing domestic electricity demand and the exports proposed in this Application, consistent with the public interest standard under NGA section 3.

Renewable Power Across the United States

Over the past two decades, wind and solar generation have become an increasingly significant part of the U.S. electricity supply. According to EIA, wind and utility-scale solar accounted for approximately 17% of total U.S. electricity generation in 2025, compared to less than 1% in 2005. In 2025, wind and utility-scale solar together generated approximately 760,000 GWh of electricity, an increase of 88,000 GWh from 2024. Wind generation increased by 3% from 2024, while utility-scale solar generation increased by 34%, continuing solar's year-over-year growth trend since 2006. When small-scale solar is included, wind and solar accounted for approximately 19% of total U.S. net generation in 2025. These trends demonstrate that renewable generation is supplying a growing share of U.S. electricity needs.¹⁶ This sustained growth in non-gas generation capacity nationwide reinforces that natural gas supply is not being displaced from, and remains available to, the export market.

Effects on Domestic Prices of Natural Gas - Henry Hub (HH) Natural Gas Spot Prices: Past, Current, and Future

In regard to perceived effects on domestic prices of natural gas, the past, current and future prices at Henry Hub are discussed below.

Henry Hub (HH) Natural gas spot prices are currently at \$3.23/MMBtu on June 26, 2026.¹⁷ Historically, since 2012, HH prices have mostly remained in the low \$2 to low \$4/MMBtu range, other than in 2022 when they rose to \$6+/MMBtu for almost 6 months due to the Ukraine-Russia war and in January 2026 when they rose to monthly average \$7+/MMBtu due to an Arctic blast that caused freezing at major

¹⁵ Id.

¹⁶ U.S. Energy Information Administration, Solar, Wind and solar generated a record 17% of U.S. electricity in 2025, Today in Energy (March 20, 2026), <https://www.eia.gov/todayinenergy/detail.php?id=67367>.

¹⁷ U.S. Energy Information Administration, Henry Hub Natural Gas Spot Price, Natural Gas (June 26, 2026), <https://www.eia.gov/dnav/ng/hist/rngwhhdD.htm>.

production sites. Although the war is ongoing, since May 2023 until June 2026, on a monthly basis, the HH spot prices have settled down and remained between a low of \$2.15 to \$3.14/MMBtu with few occasional rises, for example due to severe winter weather in January 2025 and due to winter storm in January 2026.¹⁸ Combined with the continued growth in domestic natural gas production and reserves discussed previously, this historical resilience supports the conclusion that the U.S. market has the capacity to absorb the additional export volumes proposed in this Application without sustained upward price pressure.

NYMEX Henry Hub futures indicate that market participants expect natural gas prices to remain moderate, with the October 2028 contract trading at approximately \$3.575/MMBtu.¹⁹

This forward-looking pricing is consistent with, and lends further support to, the conclusion that continued growth in domestic supply is expected to keep pace with growing demand, including demand associated with LNG exports.

According to EIA's Annual Energy Outlook 2026, growth in U.S. LNG exports and domestic natural gas consumption is expected to drive only modest increases in Henry Hub prices through 2050 across nearly all modeled cases, even as natural gas production grows from 107 Bcf/d in 2025 to between 133 and 151 Bcf/d by 2050.²⁰

In summary, the available evidence strongly supports the conclusion that U.S. domestic natural gas requirements remain fully protected: the resource base is abundant, production is expected to grow materially, and projected domestic price impacts from LNG export growth remain manageable. LNG exports can therefore expand without compromising U.S. energy security or the ability of American households, industry, and power generators to obtain the natural gas they require.

5.3 Other Public Interest Considerations

New Markets

According to EIA, U.S. LNG exports to Europe increased 141% or 4.0 Bcf/day in 2022 compared with 2021 as Europe could no longer rely on Russian gas supply. Prior to the invasion of Ukraine, Russia was the

¹⁸ Id.

¹⁹ CME Group, Henry Hub Natural Gas Futures, <https://www.cmegroup.com/markets/energy/natural-gas/natural-gas.html> (last visited June 26, 2026).

²⁰ U.S. Energy Info. Admin., *Annual Energy Outlook 2026*, Narrative § "Oil and Natural Gas Supply, Disposition, and Prices" (Apr. 2026), <https://www.eia.gov/outlooks/aeo/narrative/>.

primary supplier of natural gas, contributing to over 40% of Europe's imported natural gas.²¹ Since then, the Institute for Energy Economics and Financial Analysis states Europe's dependence on LNG from the U.S. has deepened due to further disruptions caused by the war in the Middle East. In 2026, two thirds of the continent's LNG imports are expected to be from the U.S. By 2028, U.S. imports are forecasted to be as much as 80%.²² This projected increase underscores the continuing importance of U.S. LNG in supporting European energy supply and responding to global market disruptions.

Brazil has become the newest contender for LNG supply as droughts threaten the country's dependence on hydropower. In 2024, hydropower accounted for approximately 56% of Brazil's electricity generation highlighting grid vulnerabilities when reservoir levels drop. Since 2020, the country has expanded its LNG regasification infrastructure and doubled its import capacity from 2.5 Bcf/d in 2020 to 5.1 Bcf/d in August 2025. The United States supplied approximately 72% of Brazil's LNG imports in 2024, and Brazil is increasingly considering longer-term LNG contracts to improve price stability and supply security.²³

In 2025, the U.S. exported approximately 0.3 Bcf/d of LNG to the Caribbean, the second-highest volume since the first LNG cargo departed Sabine Pass in 2016, according to the U.S. Department of Energy's LNG Exports and Re-Exports Details. U.S.-origin cargos supplied approximately 85% of all LNG imported by the Dominican Republic, Jamaica, and Panama in 2024, demonstrating the region's growing reliance on U.S. LNG supply. Additional regasification projects under construction in Honduras and the Bahamas further indicate continuing demand for LNG infrastructure and supply.²⁴

These trends across Europe, Brazil, and the Caribbean demonstrate the sustained growth of U.S. LNG exports into diversified global markets, with direct benefits to American economic and strategic interests. Each additional market that comes to depend on U.S. LNG strengthens American leverage in global energy markets, deepens economic and diplomatic ties with U.S. allies and trading partners, and reduces the ability of geopolitical rivals to use energy supply as a tool of coercion. These benefits are consistent with, and further reinforce, DOE's own conclusion in the 2024 LNG Export Study that expanding U.S. LNG exports increases U.S. GDP, supports domestic job creation, improves the nation's trade balance, and

²¹ U.S. Energy Information Administration, Europe Was the Main Destination for U.S. LNG Exports in 2022, Today in Energy (Mar. 22, 2023), <https://www.eia.gov/todayinenergy/detail.php?id=55920>.

²² Institute for Energy Economics and Financial Analysis, Europe to source two-thirds of its LNG imports from U.S. in 2026 as dependence deepens, by Ana Maria Jaller-Makarewicz (May 13, 2026), <https://ieefa.org/articles/europe-source-two-thirds-its-lng-imports-us-2026-dependence-deepens>.

²³ U.S. Energy Information Administration, Brazil is expanding its liquefied natural gas import infrastructure, Today in Energy (Oct. 29, 2025), <https://www.eia.gov/todayinenergy/detail.php?id=66504>.

²⁴ U.S. Department of Energy, Office of Hydrocarbon Gas Exports, Natural Gas Imports and Exports Monthly 2025, <https://www.energy.gov/hgeo/articles/natural-gas-imports-and-exports-monthly-2025>.

enhances both domestic and international energy security. The continued growth of the export markets discussed above accordingly supports a finding that the exports proposed in this Application are consistent with, and affirmatively advance, the public interest.

U.S. Economic and Industrial Benefits

The U.S. Department of Energy released an updated study on price impacts in December 2024 (the "2024 LNG Export Study"), examining the economic and environmental effects of varying levels of lower-48 sourced LNG export scenarios.²⁵ Following a public comment period that closed in March 2025, DOE issued its Response to Comments on May 19, 2025, finalizing its conclusions.²⁶ Based on the complete record, including, the study, the public comments received, and DOE's Response to Comments, DOE concluded that the United States has a robust natural gas supply sufficient to meet growing levels of exports while minimizing impacts to domestic prices; that growing LNG exports increases U.S. GDP and expands jobs while improving the trade balance; and that increasing U.S. LNG exports enhances domestic and international energy security with no discernable impact on global greenhouse gas emissions.²⁷ DOE concluded that the complete record supports the proposition that exports of LNG from the United States are in the best interest of the American public.²⁸

These GDP and trade-balance benefits are directly reflected in the Project itself. Approximately \$1.2 billion of the Project's equipment and technology package is expected to be sourced from the United States, covering liquefaction technology and equipment, refrigerant compressors, gas turbines and drivers, gas pretreatment systems, power generation equipment, electrical systems, control and automation packages, valves, pumps, metering systems, and other specialized components. The Project will also generate demand for U.S.-based engineering, project management, technical services, commissioning, spare parts, and long-term maintenance. In effect, a meaningful portion of the capital expenditure on this Mexico-based facility converts directly into U.S. industrial exports and U.S. manufacturing activity, reinforcing the trade-balance and job-creation benefits DOE identified in the 2024 LNG Export Study.

²⁵ U.S. Department of Energy, 2024 LNG Export Study: Energy, Economic, and Environmental Assessment of U.S. LNG Exports (Dec. 2024), <https://hgeo.energy.gov/app/docketindex/docket/index/30>

²⁶ U.S. Department of Energy, Response to Comments for 2024 LNG Export Study: Energy, Economic, and Environmental Assessment of U.S. LNG Exports (May 19, 2025), https://www.energy.gov/sites/default/files/2025-10/Response%20to%20Comments_with%20Text%20Box.pdf

²⁷ U.S. Department of Energy, DOE Finalizes 2024 LNG Export Study, Paving Way for Stronger American Energy Exports (May 19, 2025), <https://www.energy.gov/articles/doe-finalizes-2024-lng-export-study-paving-way-stronger-american-energy-exports>

²⁸ Id.

Applying a conservative estimate of approximately 1,500 U.S. jobs supported per \$1 billion of equipment expenditure, the Project's \$1.2 billion in U.S.-sourced equipment would support roughly 1,800 U.S. job-equivalents annually during the manufacturing and delivery period. Sustained over the Project's estimated three-year manufacturing and delivery timeline, this represents a substantial multi-year employment impact across U.S. manufacturing, engineering, and the associated supply chain.

These benefits extend well beyond the Project's initial construction period. LNG facilities require decades of ongoing replacement parts, turbine and compressor servicing, software and controls upgrades, and technical support, creating a recurring stream of aftermarket export revenue for U.S. equipment manufacturers and service providers long after the Project's construction is complete.

Taken together, these benefits illustrate how the Project pairs U.S. natural gas resources, technology, and manufacturing capacity with Mexican geography, infrastructure, and labor to create a globally competitive, integrated North American LNG supply chain.

Trade Balance and Energy Security

U.S. exports of natural gas have a direct positive impact on the U.S. balance of trade and result in a wealth transfer into the United States. This is particularly significant in the context of the U.S.-Mexico trade relationship: every dollar of U.S. natural gas, equipment, technology, and services purchased in connection with the Project represents an additional U.S. export to Mexico, at a time when the U.S. goods trade deficit with Mexico reached approximately \$197 billion in 2025.²⁹

Global markets continue to face a tense geopolitical climate due to the Ukraine-Russia war, the Israel-Gaza conflict, and broader instability involving Hezbollah and Iran. In this environment, U.S. LNG supply helps in creating an efficient and transparent international energy market. U.S. exports of LNG can diversify global LNG supplies and increase the volumes of LNG available on a global scale, thereby improving energy security for many U.S. allies and trading partners. Constricting LNG supplies at such times will force U.S. allies to depend on LNG from sources that may not favor the United States and may use hydrocarbon sales revenue to undermine U.S. interests.

The exports proposed herein are consistent with the goal of providing alternative supply sources, as well as the energy regulatory agenda and international commitments made by the U.S. government.

²⁹ Office of the U.S. Trade Representative, *Mexico*, <https://ustr.gov/countries-regions/americas/mexico>; U.S. Bureau of Economic Analysis, *U.S. International Trade in Goods and Services, December and Annual 2025* (2026), <https://www.bea.gov/news/2026/us-international-trade-goods-and-services-december-and-annual-2025>.

A decision to prohibit exports of natural gas for the Project would cause the United States to forego the economic and international benefits discussed herein.

In sum, the public interest is advanced by granting the requested authorization.

6.0 Review of Environmental Effects

6.1 This Application should be subject to a Categorical Exclusion under NEPA

Freedom LNG's affiliate, BRAVO LNG, will construct and operate the Project entirely outside the United States, primarily in Mexico. The Project will utilize existing and future cross-border pipeline infrastructure and does not involve new construction within the U.S. Under established DOE/HGEO precedent, applications involving exports of natural gas to Mexico for liquefaction and re-export, where no new U.S. facilities are constructed, are categorically excluded from detailed environmental review under the National Environmental Policy Act ("NEPA").³⁰

Applicant proposes to construct the Project nearshore the Port of Matamoros, within the territorial waters and territory of Mexico. The environmental impacts from this proposed Project will be subject to a thorough review by Mexican regulatory authorities. The Project will undergo a thorough environmental and social impact review that is similar to the requirements imposed by NEPA. Additionally, Applicant proposes to export natural gas to Mexico via the Sur de Texas-Tuxpan Pipeline, which was authorized by the Federal Energy Regulatory Commission ("FERC") pursuant to section 3 of the NGA.³¹ Before issuing its authorization, FERC reviewed the environmental impacts from the Valley Crossing Pipeline and developed an EA, and a similar review would be conducted for any new FERC jurisdictional border-crossing pipelines that may be proposed in the future. As a result, DOE/HGEO has no obligation to perform a NEPA analysis with respect to the impacts from natural gas transported by the Valley Crossing Pipeline, or any future FERC-permitted border-crossing pipeline. If DOE/HGEO decides to do so, then it would unnecessarily duplicate the review conducted by FERC.

Freedom LNG respectfully requests that DOE/HGEO determine that a categorical exclusion from the requirement to produce an environmental assessment ("EA") and/or an environmental impact statement ("EIS"), is both applicable and appropriate for DOE/HGEO's review of the export volumes requested here.

³⁰ See, e.g., Energía Costa Azul, S. de R.L. de C.V., Opinion and Order Granting Long-Term Authorization to Re-Export U.S.-Sourced Natural Gas in the Form of Liquefied Natural Gas from Mexico to Non-Free Trade Agreement Countries (ECA Large-Scale Project), DOE/FE Order No. 4365, FE Docket No. 18-145- LNG (Mar. 29, 2019); Mexico Pacific Limited LLC, Opinion and Order Granting Long-Term, Multi-Contract Authorization to Export U.S.-Sourced Natural Gas By Pipeline to Mexico for Liquefaction and Re-Export in the Form of Liquefied Natural Gas to Non-Free Trade Agreement Countries, DOE/FE Order No. 4312, FE Docket No. 18-70-LNG (Dec. 14, 2018); Epsilon LNG LLC, Opinion and Order Granting Long-Term Authorization to Export Natural Gas to Mexico for Liquefaction, and to Re-Export U.S.-Sourced Natural Gas in the Form of Liquefied Natural Gas From Mexico to Free Trade Agreement and Non-Free Trade Agreement Nations, DOE/FE Order No. 4629, FE Docket No. 20-31-LNG (Dec. 8, 2020).

³¹ Valley Crossing Pipeline, LLC, 161 FERC ¶ 61,084 (2017).

Application of a categorical exclusion in this case is appropriate because the BRAVO LNG Plant will be located in Mexico, beyond the scope of DOE/HGEO's jurisdiction. Further, under DOE/HGEO established practice, the existing physical pipeline capacity in the U.S. exceeds the volumes Freedom LNG is requesting for export to Mexico, meaning the categorical exclusion should apply.

Accordingly, under the relevant DOE regulations and DOE/HGEO precedent, the requested exports associated with the Project are not expected individually or cumulatively to have significant negative environmental impacts in the United States.

The Council on Environmental Quality ("CEQ") has adopted regulations which state that the application of categorical exclusions to certain categories of actions is appropriate where the implementing agency has determined such actions are not expected to have individually or cumulatively significant environmental impacts.³² DOE regulations implementing NEPA have recognized Categorical Exclusion B5.7, generally exempting "[a]pprovals ... of new authorizations . . . to . . . export natural gas under section 3 of the Natural Gas Act that involve minor operational changes (such as changes in natural gas throughput, transportation, and storage operations) but not new construction."³³ Therefore,

" 'indirect effects pertaining to increased gas production were not reasonably foreseeable' and therefore not subject to NEPA review.

[Where] 'the Department could not estimate the locale of production, it was in no position to conduct an environmental analysis of corresponding local-level impacts, which inevitably would be more misleading than informative.' The . . . effects must be 'reasonably foreseeable and have a reasonably close causal relationship to the proposed action' to be considered under NEPA, . . . [and the] 'effects should generally not be considered if they are remote in time, geographically remote, or the product of a lengthy causal chain.' Under this standard, consideration of upstream impacts

³² See 40 C.F.R. § 1501.4(a).

³³ 10 C.F.R. Part 1021, Subpart D, Appendix B § B5.7.

is not required.”³⁴

DOE has not considered “potential upstream and downstream impacts as part of its NEPA analyses for natural gas export approvals.” Induced upstream production impacts are not reasonably foreseeable for NEPA purposes and are therefore not “effects” subject to analysis under NEPA.³⁵

For Applicant, the project facilities will be constructed entirely outside of the United States, primarily in Mexico and, with respect to the FLNG facilities, some in Asia. Furthermore, the physical capacity of the existing cross-border pipeline facilities along the U.S.-Mexico border exceeds the proposed export volumes. If future cross-border pipeline facilities are required to further serve the Project, they will be reviewed in due course, for instance for Presidential Permit authorization under Section 3 of the NGA.³⁶

Within FERC’s NEPA review process associated with the construction of LNG export projects located in the United States, DOE/HGEO has served as a cooperating agency. However, in the case of the Project, construction and operation of Project facilities will occur outside of the United States, predominantly in Mexico. DOE/HGEO does not authorize the construction or operation of those non-U.S. facilities; rather, DOE/HGEO’s review is focused on potential environmental impacts resulting from the exercise of its authority under Section 3 of the NGA.³⁷ The environmental effects of construction and operation of the Project facilities will be reviewed by relevant Mexican authorities under applicable Mexican environmental laws and regulations.

A finding that Categorical Exclusion B5.7 applies to exempt the Application from review under NEPA would be consistent with the conclusion that DOE/HGEO reached in other instances where it has reviewed proposals to export U.S. gas to a foreign country for re-export to non-FTA countries. DOE found that Categorical Exclusion B5.7 of DOE/FE Order No. 3768 was applicable because the only construction proposed would occur outside of the United States, which “is outside the scope of [DOE’s] environmental review under NEPA . . . which necessarily focuses on potential environmental impacts within the United States.”³⁸

³⁴ National Environmental Policy Act Implementing Procedures, 85 Fed. Reg. 78,197, 78,201 (Dec. 4, 2020).

³⁵ *Id.*

³⁶ See 15 U.S.C. § 717b(a); Valley Crossing Pipeline, LLC, 161 FERC ¶ 61,084 (2017).

³⁷ National Environmental Policy Act Implementing Procedures, 85 Fed. Reg. 78,197, 78,198 (Dec. 4, 2020) (“DOE need not review potential environmental impacts associated with the construction or operation of natural gas export facilities because DOE lacks authority to approve the construction or operation of those facilities”; DOE’s NEPA review is “properly focused on potential environmental impacts resulting from the exercise of its NGA section 3 authority”).

³⁸ Pieridae Energy (USA) Ltd., DOE/FE Order No. 3768, FE Docket No. 14-179-LNG, at 190 (Feb. 5, 2016).

DOE has determined that its decision-making process is better when “focusing its NEPA review on those activities that are within DOE’s authority under the NGA,” as opposed to “ . . . considering the potential environmental effects from activities that are beyond its decision-making authority, such as LNG terminal construction and operation.”³⁹

“DOE believes it is appropriate for its NEPA review of natural gas export applications to consider the potential environmental impacts starting at the point of delivery to the export vessel, and extending to the territorial waters of the receiving country.” Based on that perspective, “DOE has determined that transport of natural gas by marine vessel normally does not pose the potential for significant environmental impacts.”⁴⁰

In addition, “downstream emissions at the point of consumption are too attenuated to be reasonably foreseeable and do not have a reasonably close causal relationship to the granting of an export authorization.” DOE agreed that consumption market “subject matter falls outside DOE’s NEPA review obligations because the regasification and ultimate burning of LNG in foreign countries are beyond the scope of DOE requirements under NEPA.”⁴¹

If, despite the foregoing arguments, DOE/HGEO determines that an EA is necessary for the Project, the Project nonetheless should be approved.

To satisfy DOE/HGEO’s obligations under NEPA with respect to the proposed exports, DOE/HGEO should only conduct a limited review in preparing an EA.

Current DOE policy does not focus on environmental issues as part of its non-FTA export decisions. Nevertheless, as these issues have received attention in prior proceedings, Applicant addresses them below for completeness.

DOE/HGEO has recognized in similar proceedings that, to the extent its environmental review extends beyond Categorical Exclusion B5.7, that review should be limited to the global nature of GHG emissions associated with re-exporting U.S.-sourced LNG from Mexico from a life cycle perspective. Direct and indirect environmental impacts that would occur in the United States, and those that affect the global commons, such as global climate change resulting from emissions of greenhouse gases (GHGs), would be the appropriate scope of any such EA.

³⁹ U.S. Dept. of Energy, National Environmental Policy Act Implementing Procedures, 85 Fed. Reg. 78,198, 78,199 (Dec. 4, 2020).

⁴⁰ Id.

⁴¹ Id at 78,200.

DOE's National Energy Technology Laboratory ("NETL") conducted a study in 2014, updated in 2019 (collectively, "GHG Studies"), of GHG emissions attributable to LNG exports from the lower-48 states, to inform decisions on applications to export natural gas from the lower-48 states in the form of LNG to non-FTA countries.⁴² The findings of the GHG Studies are applicable to assessment of the GHG emissions related to the exports proposed in the Application. DOE's study of Life Cycle GHG emissions provides sufficient consideration of these emissions.

NETL published the Life Cycle Greenhouse Gas Perspective on Exporting Liquefied Natural Gas from the United States report ("LCA GHG") in 2014. This report calculated the life cycle GHG emissions for LNG made from natural gas sourced from the lower-48 states and exported to markets in Europe and Asia. The report concluded that the use of U.S. LNG exports for power production in European and Asian markets would not increase global GHG emissions from a life cycle perspective, when compared to regional coal extraction and consumption for power production.⁴³

NETL updated the 2014 LCA GHG Report in 2019.⁴⁴ Results of the updated report were consistent with those of the earlier report that, "while acknowledging uncertainty, to the extent U.S. LNG exports are preferred over coal in LNG-importing nations, U.S. LNG exports are likely to reduce global GHG emissions on [a] per unit of energy consumed basis for power production." Moreover, "to the extent U.S. LNG exports are preferred over other forms of imported natural gas, they are likely to have only a small impact on global GHG emissions."⁴⁵

While DOE examined potential GHG impacts more recently as part of its 2024 LNG Export Study, DOE has since clarified that this environmental analysis does not bear on its public interest determinations for non-FTA export applications, which instead rest on the Study's economic and energy security findings.⁴⁶ Applicant nonetheless addresses the issue below in the interest of a complete record. Across the range of scenarios DOE modeled, the agency found that expanded U.S. LNG exports are more likely to displace

⁴² U.S. Dept. of Energy, Life Cycle Greenhouse Gas Perspective on Exporting Liquefied Natural Gas From the United States, 79 Fed. Reg. 32,260 (June 4, 2014).

⁴³ Id.

⁴⁴ U.S. Dept. of Energy, Life Cycle Greenhouse Gas Perspective on Exporting Liquefied Natural Gas From the United States: 2019 Update, DOE/NETL-2019/2041 (Sept. 12, 2019); see also U.S. Dept. of Energy, Notice of Availability of Report Entitled Life Cycle Greenhouse Gas Perspective on Exporting Liquefied Natural Gas From the United States: 2019 Update and Request for Comments, 84 Fed. Reg. 49,278 (Sept. 19, 2019).

⁴⁵ U.S. Dept. of Energy, Life Cycle Greenhouse Gas Perspective on Exporting Liquefied Natural Gas From the United States: 2019 Update – Response to Comments, 85 Fed. Reg. 72, 85 (Jan. 2, 2020).

⁴⁶ U.S. Department of Energy, Docket No. RM24-1 (LNG Export Study), Docket Index Update (Oct. 7, 2025), <https://hgeo.energy.gov/app/docketindex/Docket/Index/30>.

competing supplies of natural gas, coal, and oil than to displace renewable generation. DOE also determined that, even under scenarios where exports substantially exceed current levels, the resulting change in cumulative global GHG emissions through 2050 remains a small fraction of total projected emissions. So small that, given the inherent uncertainty of modeling global energy markets decades into the future, DOE could not conclude the effect differs meaningfully from zero.⁴⁷ Separately, based on the complete record from the 2024 Study and the public comments received, DOE determined that the United States possesses a robust natural gas supply capable of meeting rising export levels while limiting impacts to domestic prices, that expanding LNG exports increases U.S. GDP, supports job creation, and improves the nation's trade balance, and that higher levels of U.S. LNG exports strengthen relationships with U.S. trading partners and allies and enhance both domestic and international energy security, with no discernible impact on global greenhouse gas emissions.⁴⁸ On the basis of this record, DOE itself concluded that U.S. LNG exports are in the best interest of the American public.

For review of the life cycle emissions related to the exports proposed in this Application, it would be reasonable to apply the GHG Studies and the 2024 LNG Export Study's findings discussed above, to the extent DOE considers them relevant. For Applicant, the source of natural gas (the lower-48 states) is the same as that dealt with in the studies, and pipeline transport within the U.S. would also be comparable. Marine shipments of LNG from BRAVO LNG would share similar attributes to shipments from the U.S. Gulf Coast location analyzed in the GHG Studies. As noted above, this Application emphasizes exports to Caribbean, European, and Central and South American markets, and transport to those regions should accordingly be the focus of DOE's assessment here, to the extent any such assessment is undertaken.

An EA would not analyze potential environmental impacts associated with elements of the Application that would occur within the sovereign territory of Mexico or any other country aside from the United States. These include the potential local and regional impacts of pipeline transportation of natural gas within Mexico to the BRAVO LNG terminal operations, transport, and use of LNG within receiving FTA and non-FTA countries.

⁴⁷ U.S. Department of Energy, Response to Comments for 2024 LNG Export Study: Energy, Economic, and Environmental Assessment of U.S. LNG Exports (May 19, 2025), <https://www.energy.gov/sites/default/files/2025-10/Response%20to%20Comments%20with%20Text%20Box.pdf>.

⁴⁸ U.S. Department of Energy, DOE Finalizes 2024 LNG Export Study, Paving Way for Stronger American Energy Exports (May 19, 2025), <https://www.energy.gov/articles/doe-finalizes-2024-lng-export-study-paving-way-stronger-american-energy-exports>; Response to Comments, *supra* note 3.

An analysis of environmental impacts that occur within another sovereign nation as the result of actions approved by that sovereign nation is not required by NEPA. Executive Order (“E.O.”) No. 12114 requires federal agencies to prepare an analysis of significant impacts from a federal action in certain defined circumstances and exempts agencies from preparing analyses in others. The E.O. does not require federal agencies to evaluate impacts outside the United States when the foreign nation is participating with the United States or is otherwise involved in the action.⁴⁹

The BRAVO LNG Plant proposed in this Application would be located in Mexico, where it would have to be constructed and sited in accordance with all applicable Mexican laws, regulations, and standards. Moreover, the only aspects of the Project bearing on the global commons, life cycle emission of GHGs and the marine transport of LNG in international waters, are precisely the categories DOE’s GHG Studies and Categorical Exclusion B5.7 already address as not posing the potential for significant impacts.

6.2 Permitting and Environmental Impact Review by The Government of Mexico

The BRAVO LNG project will be built and operated wholly within Mexico and its territorial waters.⁵⁰ Consequently, the Project will be subject to environmental review and permitting requirements under Mexican federal laws and will undergo a comprehensive review similar to the review conducted under NEPA. DOE/HGEO has recently stated its intent to consider Mexico’s environmental review process when preparing an EA in other export proceedings for the purpose of comprehensiveness.⁵¹ Detailed information regarding the required environmental and social permits for the Project is attached hereto as Appendix C and D, and an overview of anticipated operational emissions for the Project is attached hereto as Appendix E.

The environmental review process in Mexico is governed by its primary statute named *Ley General del Equilibrio Ecológico y la Protección al Ambiente* (General Law of Ecological Balance and Environmental Protection, or “LGEEPA”).⁵² Administration of LGEEPA with respect to the Project is delegated to the *Agencia Nacional de Seguridad Industrial y de Protección al Medio Ambiente del Sector Hidrocarburos* (National Agency for Industrial Security and Environmental Protection for the Hydrocarbon Industry, or

⁴⁹ Exec. Order No. 12,114, Environmental effects abroad of major Federal actions, § 2-3(b) (Jan. 4, 1979), <https://www.archives.gov/federal-register/codification/executive-order/12114.html>.

⁵⁰ The Project is proposed at within 5 km radius of 27° 54' 55" N, 110° 52' 48" W. These coordinates will be included in the applications submitted to the Mexican regulatory agencies for review and approval of the Project. Approval of the Project by the Mexican regulators includes authorization to site the Project at these coordinates.

⁵¹ See Energía Costa Azul, S. de R.L. de C.V., Notice of Environmental Assessment, Docket No. 18-145-LNG, at 6 n.32 (Jul. 12, 2022), Vista Pacific LNG, S.A.P.I. de C.V., Notice of Environmental Assessment, Docket No. 20- 153-LNG, at 5 n.28 (Jul. 12, 2022).

⁵² LGEEPA, articles 1, 2 and 28-30.

“ASEA”) within the *Secretaría de Medio Ambiente y Recursos Naturales* (Ministry of Environmental and Natural Resources).⁵³ ASEA has jurisdiction over industrial, operational, and environmental safety review for the construction of natural gas pipelines and LNG facilities.⁵⁴

Affiliate of Applicant will produce a *Manifestación de Impacto Ambiental* (Environmental Impact Assessment, or “MIA”) and an *Estudio de Riesgo Ambiental* (Environmental Risk Assessment) application, assessing potential environmental impacts, operational hazards and mitigation of such impacts and hazards, associated with all phases of the Project, including site preparation, construction, operation, maintenance, and decommissioning.⁵⁵ The MIA/Environmental Risk Assessment application includes the following information: (i) general information about the project, the proponent and the person responsible for the environmental impact study; (ii) a description of the works or activities and, if applicable, of the partial development programs or plans; (iii) a description of interdependence between the planning documents and applicable legal ordinances; (iv) a description of the regional environmental system and indication of trends in the region's development and deterioration; (v) identification, description and evaluation of cumulative and residual environmental impacts of the regional environmental system; (vi) strategies for the prevention and mitigation of cumulative and residual environmental impacts of the regional environmental system; (vii) regional environmental forecasts and, where appropriate, evaluation of alternatives; and (viii) identification of the methodological instruments and technical elements that support the results of the environmental impact assessment.⁵⁶ The MIA, prepared for a natural gas pipeline or LNG Facility, must also contain an Environmental Risk Assessment that separately assesses safety and risk mitigation procedures.⁵⁷

The affiliate of Applicant will request ASEA’s Environmental Impact Authorization (“EIA”) and Environmental Risk Authorization (“ERA”) for the Project on the basis of the MIA and the Environmental Risk Assessment application. In course of the review process, ASEA will provide notice to, and consider comments from, the public and various federal agencies. If, based on the outcome of this review, ASEA finds that the project is environmentally viable, it will issue a resolution approving the MIA and issue an

⁵³ Ley de la Agencia Nacional de Seguridad Industrial y de Protección al Medio Ambiente del Sector Hidrocarburos (Law of the National Agency of Industrial Safety and Environmental Protection of the Hydrocarbons Sector, or “LASEA”), articles 1, 5 and 7.

⁵⁴ Id.

⁵⁵ LGEEPA, articles 28-30.

⁵⁶ Reglamento de la Ley General del Equilibrio Ecológico y la Protección al Ambiente en Materia de Evaluación del Impacto Ambiental (Regulations under the General Law on Ecological Equilibrium and Environmental Protection regarding Environmental Impact Assessment, or “REIA”), article 13.

⁵⁷ LGEEPA, articles 28-30.

EIA and ERA containing the compulsory terms and conditions, including mitigation measures, of the authorization. ASEA retains jurisdiction over the enforcement of, and compliance with, the terms and conditions of the EIA and ERA, as well as a Project's continued compliance with applicable laws, regulations, and conditions. Applicant's affiliate will have to apply for approval of its *Sistemas de Administración de Seguridad Industrial, Seguridad Operativa y Protección* (Industrial, Operational, and Environmental Safety Management System).⁵⁸

Along with acquisition of permits and authorizations from the Mexican government for environmental and safety matters, affiliate of Applicant also must perform a *Manifestación de Impacto Social* (Social Impact Assessment, or "MISSE"), which discloses the potential social impacts caused by the Project and propose a social management plan.⁵⁹ The review and approval of Applicant's MISSE is governed by the *Secretaría de Energía* (Ministry of Energy). In addition, Applicant's affiliate must also obtain individual permits for liquefaction, electricity generation, gas transportation by pipeline and storage of natural gas in Mexico from the Comisión Reguladora de Energía (Energy Regulatory Commission).⁶⁰

Affiliate of Applicant plans to submit all applications necessary for the permits and authorizations described herein and in Appendix C, at the same time or soon after the filing of the instant application.

6.3 FERC Environmental Review

As mentioned above, Applicant proposes to export natural gas to Mexico via the Sur de Texas-Tuxpan Pipeline.

The exclusive jurisdiction over the siting and approval of natural gas pipeline facilities under the NGA lies with FERC and not with DOE. Therefore, DOE/HGEO should not undertake efforts to duplicate the reviews already conducted by FERC, but rather, the EA should take into account only the environmental review previously performed by FERC for the Valley Crossing Pipeline to the extent relevant.

It is not anticipated that the proposed exports will require any new construction or expansions of U.S. pipeline facilities. Hence, the possibility of future expansion or construction of cross-border facilities should not be included in DOE/HGEO's environmental analysis.

7.0 Appendices

Appendix A: Legal Opinion of Counsel for Freedom LNG LLC

⁵⁸ LASEA, articles 12-13.

⁵⁹ Ley de Hidrocarburos (Hydrocarbons Law, or "LH"), article 121.

⁶⁰ LH, article 48; Ley de la Industria Eléctrica (Power Industry Law, or "LIE"), article 17.

Appendix B: Verification

Appendix C: Mexico Overall Permitting Overview

Appendix D: Project EIA Requirements in Mexico

Appendix E: Project Operational Emissions

8.0 Conclusion

For the reasons set forth above, Freedom LNG respectfully requests that DOE/HGEO issue an order granting Freedom LNG's authorization, for a term extending twenty (20) years beyond the date of first export of LNG, on its own behalf and as agent for others to -

- (1) export 0.940 Bcf/d of natural gas by pipeline to Mexico;
- (2) re-export the equivalent of 0.840 Bcf/day or approximately 307 Bcf/year as LNG (equivalent to 6.0 MTPA of LNG) from the Project to
 - a) any country with which the United States currently has, or in the future may enter into, a free trade agreement requiring national treatment for trade in natural gas; and (b) any country with which the United States does not have a free trade agreement requiring national treatment for trade in natural gas and with which trade is not prohibited by United States law or policy; and
- (3) use up to the difference (*e.g.*, 0.1 Bcf/d) in the transportation and liquefaction process in Mexico as well internal distribution as LNG in Mexico.

Freedom LNG further requests that the date for the commencement of authorization coincide with the date of first export. Freedom LNG requests issuance of such authorization no later than December 31, 2026.

Respectfully submitted,



Alberto Nafarrate

COUNSEL FOR FREEDOM LNG LLC

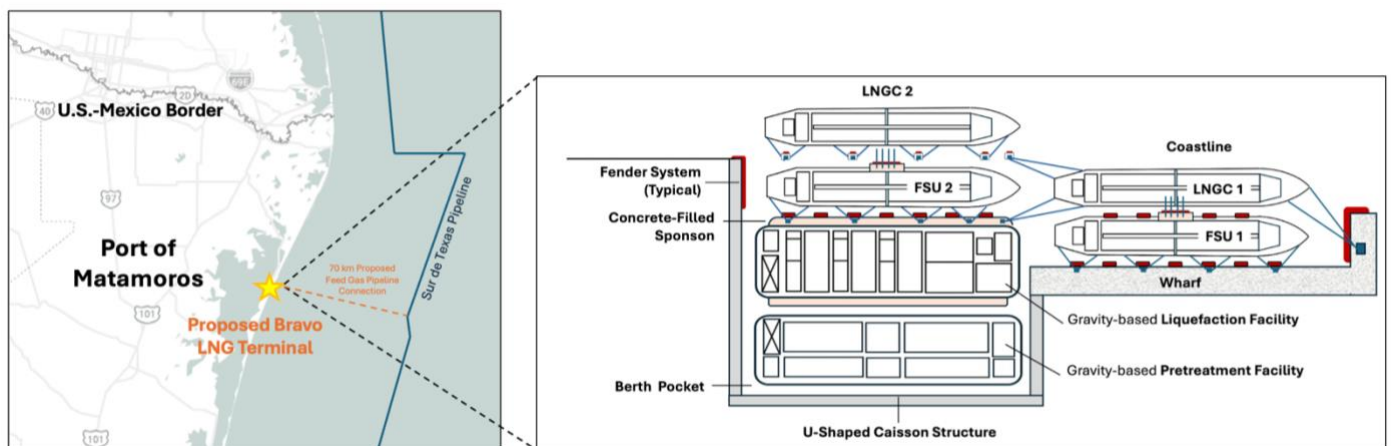
Dated: September 10, 2026

Attachment 1: BRAVO LNG Project Overview

(Location and Layout of the LNG Facility)



Figure 1. Project Location – Matamoros, Tamaulipas, Mexico

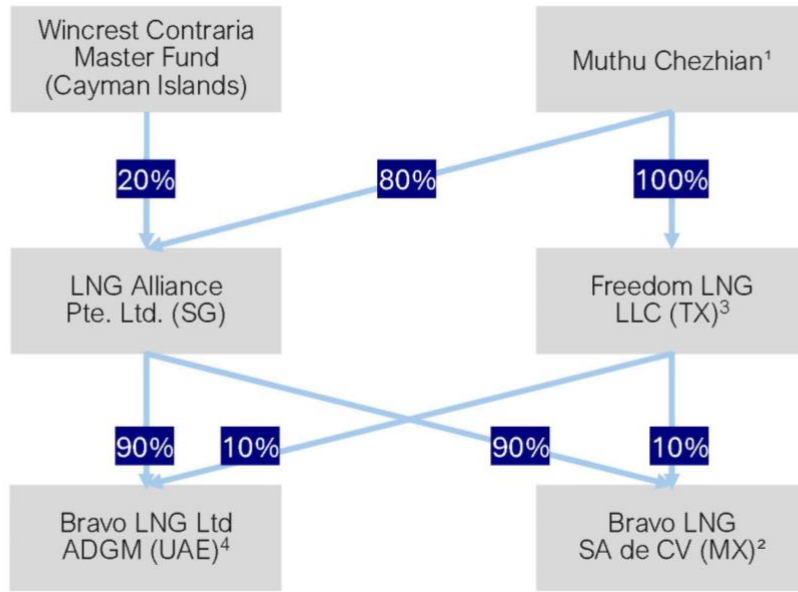


Note: Conceptual illustration only. Final layout, marine facilities, pipeline routing and infrastructure configuration are subject to detailed engineering and regulatory approvals.

Figure 2. Conceptual Terminal Layout – Port of Matamoros

Attachment 2: Freedom LNG's Organization Chart and Permits

(Freedom LNG's Organizational Chart and Related Project Permit-Holders)



¹ Dr. Chezhan is a citizen of the United States of America with a principal place of residence in Plano, Texas

² Affiliate of Freedom LNG; referred to throughout Application as owner and operator of LNG Facility. Holder of the following permits: ZOFEMAT (Zone Federal Maritimo Terrestre, translated as Federal Maritime Terrestrial Zone) Concession Permit; Environmental Impact Authorization from SEMARNAT; LNG Export Permit from SENER; LNG Liquefaction and Storage Permits from CRE

³ Holder of DOE FTA and Non-FTA Permit

⁴ FLNG Asset Holding Company

CONFIDENTIAL

Attachment 3: Documentation on Site Control

(Applicable Contracts)

MOU with Tamaulipas

Filed under seal pursuant to 10 C.F.R. § 590.202(e)

Not meant for Public Release

Appendix A: Legal Opinion of Counsel for Freedom LNG LLC



September 10, 2026

Attention: FERGAS/Ms. Amy Sweeney

Division of Regulation
Office of Global Energy Security
Hydrocarbons and Geothermal Energy Office
U.S. Department of Energy
1000 Independence Avenue, SW Washington, DC
20585

SUBJECT: Freedom LNG LLC, FE Docket No. 26-____-LNG

Application for Long-Term Authorization to Export Liquefied Natural Gas to Both FTA and Non-FTA Countries

Dear Ms. Sweeney:

This opinion is provided pursuant to Section 590.202(c) of the Department of Energy Regulations, 10 C.F.R. § 590.202(c), in support of the Application of Freedom LNG LLC ("Freedom") for Long-Term, Multi-Contract Authorization to Export Liquefied Natural Gas to Free Trade Agreement and Non-Free Trade Agreement Nations.

I am counsel to Freedom, a limited liability company organized under the laws of the State of Texas. I have reviewed and relied upon the corporate documents of Freedom LNG LLC, and it is my opinion that the proposed exports described in the Application are within the limited liability company powers of Freedom.

Very truly yours,

A handwritten signature in black ink, appearing to read "Al", with a horizontal line extending from the bottom of the signature.

Alberto Nafarrate

Acting as counsel to Freedom LNG LLC

Appendix B: Verification

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

Freedom LNG LLC

FE Docket No. 26-__-LNG

I, Muthu Chezhan, declare that I am the President of Freedom LNG LLC and am duly authorized to make this Verification; that I have read the foregoing instrument and that the facts therein stated are true and correct to the best of my knowledge, information, and belief.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed in Plano, TX on September 10, 2026.



Muthu Chezhan
President
Freedom LNG LLC

Appendix C: Mexico Overall Permitting Overview

I. Overview and Structure

The purpose of this Appendix is to summarize and provide an overview of the permitting and regulatory approval process required for the BRAVO LNG Project in Mexico. The Appendix outlines the key environmental, social and regulatory permits applicable to the hydrocarbons sector, including those required for the development of natural gas liquefaction, storage, and associated infrastructure. In particular, this Appendix outlines the principal regulatory permits required for the construction and operation of BRAVO LNG Facility and its associated infrastructure. Section II of this Appendix includes the scope of each permit, application procedures and indicative statutory processing timelines, in order to successfully obtain the permits and authorizations required for the development of offshore natural gas pipelines, liquefaction and storage projects.

II. Competent Agencies for Permitting Processes

The section provides an overview of the regulatory authorities responsible for granting permits applicable to BRAVO LNG as well as the general permitting framework governing natural gas liquefaction, storage, and associated infrastructure in Mexico. It includes a consolidated table identifying the relevant agencies, key permits, and associated regulatory processes required for the construction and operation of BRAVO LNG. The specific requirements, timelines, and sequencing of each permit application will vary depending on the configuration and scope of the project. It is generally noted that while the timing of permits and authorizations are regulated under the applicable legislation, in practice it is customary for governmental authorities to take longer to issue the permits.

BRAVO LNG is currently working on the engineering required for the construction of the Project. As a result, BRAVO LNG expects to file the first permits before CNE and ASEA (as defined and outlined below) during Q4 2027. The Project is well aligned with Mexico's broader energy and infrastructure development objectives, and BRAVO LNG expects to work closely with the relevant authorities throughout the permitting process to facilitate timely review and approval of the required permits.

1. ASEA Agencia Nacional de Seguridad Industrial y de Protección al Medio Ambiente del Sector Hidrocarburos (National Agency of Industrial Safety and Environmental Protection for the Hydrocarbon Industry)				
Registration/ Authorization	Applicability	Registration/Authorization Summary	Timing	Effective Date/Project Phase
Environmental Impact Authorization (“EIA”)	Storage, Liquefaction, Pipeline	An EIA is issued after ASEA determines, based on the applicant’s Manifestación de Impacto Ambiental (Environmental Impact Assessment, or “MIA”), that the project is environmentally viable. This permit is required before site preparation and construction activities can begin. Also, obtaining the EIA is a prerequisite to obtain all other permits required to start construction. Members of the community may require a public consultation and ASEA may, as a consequence, also request a public meeting for information. Modification or expansions may necessitate the amendment of the EIA or possibly a new EIA altogether.	120 Business Days	Valid during the construction and operation of the project
Environmental Risk Authorization (“ERA”)	Storage, Liquefaction, Pipeline	An ERA is issued in response to an applicant’s Estudio de Riesgo Ambiental (Environmental Risk Assessment), which is submitted in conjunction with the MIA. The ERA is required for activities regarded as “highly hazardous” in the hydrocarbons sector, which includes activities involving the transportation, storage, and liquefaction of natural gas.	120 Business Days	Valid during the construction and operation of the project
Registration and Authorization of the Industrial, Operational and Environmental Protection Safety Management System (“SASISOPA”)	Storage, Liquefaction, Pipeline	The SASISOPA is a technical tool governing all activities related to a project’s operations (from construction to decommissioning). Applicants must register an Industrial SASISOPA prior to the commencement of the construction activities. Even after authorization, ASEA continually monitors for compliance and may request detailed reports on implementation of the SASISOPA.	165 Business Days	Effective for the life of the project (construction, operation and decommissioning)

Unique Regulated Registry Number (“CURR”)	Storage, Liquefaction, Pipeline	The CURR is granted to identify the regulated party before ASEA. The CURR is an essential requirement for the authorization of an applicant’s SASISOPA. An applicant must register a CURR prior to commencement of construction of the project.	15 Business Days	Required prior to commencement of construction
Accidents Prevention Program (“PPA”)	Storage, Liquefaction, Pipeline	Outlines the possible risks and accidents that may occur during the operation of the project and includes response and mitigation measures.	90 days	This permit is required for the operation of the project.
Comprehensive Environmental License (“LAU”)	Storage, Liquefaction, Pipeline	Required for federally-regulated facilities that generate air emissions. The LAU outlines the processes that generate emissions and provides metric data on project-related emissions.	40 Business days	This license is required for the operational stage of the project and is permanent.
Registration as a Hazardous Waste Generator	Storage, Liquefaction, Pipeline	Applicants who generate hazardous waste must be registered with ASEA, in addition to complying with certain requirements with respect to the handling of such waste.	effective immediately	This permit is required for every stage of the project that generates hazardous waste
Registration of the Hazardous Waste Management Plan (“HWMP”)	Storage, Liquefaction, Pipeline	Large generators of hazardous waste (those who generate an annual volume of ten or more tons) are obligated to file and obtain the registration of their HWMP issued by ASEA.	60 business days	Required at any stage of the project when 10 tons or more of hazardous waste are generated.

Registration as Special Handling Wastes Generator	Storage, Liquefaction, Pipeline	Special management wastes are those generated as part of productive processes that do not have the characteristics to be considered as hazardous or solid urban wastes (domestic wastes), or are generated by large generators of urban wastes. Those who generate special management wastes in the hydrocarbons sector must register with ASEA 45 days prior to the development of any activity. Additionally, applicants must file annual reports of special management wastes generated.	20 Business Days	This permit is required for every stage of the project that generates special handling wastes.
Registration of the Special Handling Wastes Management Plan (“SHWMP”)	Storage, Liquefaction, Pipeline	Large generators of special handling wastes (those who generate an annual volume of ten or more tons) are obligated to file and obtain the registration of their SHWMP.	60 Business Days	Required at any stage of the project when 10 tons or more of this strand of waste is generated.

2. CNE Comisión Nacional de Energía				
Registration/Authorization	Applicability	Registration/Authorization Summary	Timing	Effective Date/Project Phase
Natural Gas Pipeline Transportation	Pipeline	For projects involving the transportation of natural gas through pipelines, the applicant must first submit a permit application to CRE. The CRE also approves the rates and terms and conditions of service, regulates and verifies compliance with technical operations, and regulates and verifies compliance with safety standards under the transportation permit.	90 Business days	30 years from the date it was granted
Natural Gas Storage	Storage	For projects involving natural gas storage, including the use of a floating natural gas storage unit (“FSU”), the applicant must first submit a permit application to CRE. The CRE also approves the rates and terms and conditions of service, regulates and verifies compliance with technical operations, and regulates and verifies compliance with safety standards under the storage permit.	90 Business days	30 years from the date it was granted
Liquefaction of Natural Gas	Liquefaction	For projects involving natural gas liquefaction, the applicant must first submit a permit application to CRE. The permit allows for the construction of facilities and operation of liquefaction processes.	90 Business days	30 years from the date it was granted
Electric Power Generation	Liquefaction	For projects that intend to self-supply electric generation, the applicant must first submit a permit application to CRE. Applicants must submit information related to the project schedule, corporate structure, description of the project, the applicant’s financial and technical capacity, and information on supply.	60 Business days	30 years from the date it was granted

3. SENER Secretaría de Energía (Secretary of Energy)				
Registration/Authorization	Applicability	Registration/Authorization Summary	Timing	Effective Date/Project Phase
Social Impact Assessment (“MISSE”)	Storage, Liquefaction, Pipeline	For project activities in the hydrocarbons sector, an applicant must file a MISSE for all activities requiring a permit (storage, liquefaction, and pipeline transportation), which will be evaluated and approved by SENER before commencement of the project. The MISSE discloses the potential social impacts caused by the project and should identify and consult any indigenous communities that may be affected by the project (where applicable).	90 Business days	Effective for the life of the project

4. SEMAR Secretaría de Marina (Marine Secretary)				
Registration/Authorization	Applicability	Registration/Authorization Summary	Timing	Effective Date/Project Phase
Authorization for the construction of maritime works, dredging and occupation of the seabed for the natural gas marine liquefaction platform and marine pipeline.	Storage, Liquefaction, Pipeline	The development of works occupying the marine soil and dredging activities requires an authorization which includes the construction of the works, dredging required for the construction and occupation of the seabed.	90 Calendar days	This permit will be required for construction and occupation of the seabed, for the entire lifetime of the project.
Off Port Permit	Storage, Liquefaction, Pipeline	An applicant must receive a permit from SEMAR for other LNG carriers to arrive at the facilities and dock in order to load the LNG.	90 Calendar days	20 years from the date it was granted

5. CONAGUA Comisión Nacional del Agua (National Water Commission)				
Registration/ Authorization	Applicability	Registration/Authorization Summary	Timing	Effective Date/Project Phase
Surface Water Use Concession	Storage, Liquefaction	An applicant must receive a permit from CONAGUA in order to use ocean water for project facilities (required only if such water will be destined to desalinization).	60 Business Days	Between 5-30 years
Wastewater discharge permit	Storage, Liquefaction	An applicant must receive a permit from CONAGUA in order to discharge wastewater into the ocean.	60 Business Days	Between 5-30 years

Appendix D: Project EIA Requirements in Mexico

This section outlines the Federal environmental permits required to start construction and undertake operational activities of an offshore gas pipeline, liquefaction and storage project in Mexico.

Environmental Impact Assessment (Federal)

The backbone of Mexico's environmental legislation is the Ley General del Equilibrio Ecológico y la Protección al Ambiente (General Law of Ecological Balance and Environmental Protection, or "LGEEPA"), enacted in 1988, which sets forth the main environmental policies, statutes and instruments, designed to address the different environmental impacts brought by project development and national policies.

At the federal level, permits provided by the LGEEPA are overseen by the Secretaría de Medio Ambiente y Recursos Naturales (Ministry of Environment and Natural Resources, or "SEMARNAT"), while the Procuraduría Federal de Protección al Ambiente (Environmental Attorney's Office, or "PROFEPA") is the enforcement agency of SEMARNAT, tasked with overseeing the compliance aspects of the LGEEPA.

Following the 2014 energy reform, the Federal government created the Agencia Nacional de Seguridad Industrial y de Protección al Medio Ambiente del Sector Hidrocarburos (National Agency of Industrial Safety and Environmental Protection of the Hydrocarbon Sector, or "ASEA"), which is a decentralized agency ascribed to SEMARNAT, that is responsible for overseeing industrial, operational and environmental safety for projects related to the hydrocarbons sector, including the construction of natural gas pipelines and liquefaction facilities.

Pursuant to Article 28 of the LGEEPA, the construction, operation and decommissioning of the abovementioned natural gas facilities, requires an environmental impact authorization ("EIA") issued by ASEA. The EIA will be issued after examination by ASEA of an environmental impact assessment ("MIA"), in which: (i) the environmental impacts associated with the entire life cycle of the project; (ii) necessary measures to mitigate or compensate the identified impacts; and (iii) compliance with applicable Mexican laws, regulations and standards (at the federal, state and municipal level), including zoning laws and requirements, are identified.

The contents of the MIA are standardized by ASEA and include; (i) general information about the project, the proponent and the person responsible for the environmental impact study; (ii) description of the works or activities and, if applicable, of the partial development programs or plans; (iii) interdependence between the planning documents and applicable legal ordinances; (iv) description of the regional environmental system and indication of trends in the region's development and deterioration; (v) identification, description and evaluation of cumulative and residual environmental impacts of the regional environmental system; (vi) strategies for the prevention and mitigation of cumulative and residual environmental impacts of the regional environmental system; (vii) regional environmental forecasts and, where appropriate, evaluation of alternatives; and (viii) identification of the methodological instruments and technical elements that support the results of the MIA.

All the above points should relate to all stages of the project including site preparation, construction, operation, decommissioning and abandonment. The MIA should include the results of comprehensive

analyses and environmental studies, as well as an assessment of mitigation and compensation measures, often based on the following: seabed composition, ocean water chemical composition, biological resources in the seabed, visual impact, waste water handling, hazardous materials handling, firefighting systems, noise levels and worker safety.

The EIA process also provides an opportunity for interested third parties, such as communities, competitors and non-governmental organizations to participate in the assessment process, which is widely publicized by notices published in ASEA's "Ecological Gazette", and in newspapers with broad circulation in the region where the project will be developed. In addition, ASEA solicits and considers comments from various government agencies (including CRE, SENER, state and municipal governments, etc.).

After the assessment process is finalized, an EIA will be issued by ASEA if the project is deemed environmentally sound and consistent with applicable legislation. ASEA is also tasked with the compliance and enforcement aspects of an EIA and other applicable permits and legislation, routinely undertaking inspection visits to this end and levying economic penalties, suspension orders or even site closures, when irregularities are detected.

Environmental Risk Assessment (Federal)

Pursuant to Article 30 of the LGEEPA, if a project involves highly hazardous activities (i.e., when significant amounts of hazardous substances are handled, stored, used, or generated), such as in the hydrocarbons sectors, the MIA presented to ASEA must also include an Environmental Risk Assessment for analysis.

As described in Mexican legislation, the Environmental Risk Assessment is an analytical tool designed to foresee the likelihood or probability of an adverse outcome or event, due to the handling of hazardous materials, reflecting on how such outcomes will impact the surrounding environment and populations (including workers present on site).

The Environmental Risk Assessment must incorporate all preventive measures and scenarios based on technical studies (such as fault-tree analyses, HAZOP run tests, etc.) to identify possible catastrophic scenarios, High Risk and Buffer Zones, and safety measures to prevent or mitigate such adverse scenarios.

In addition, pursuant to Article 147 of the LGEEPA, highly hazardous activities (such as the operation of a natural gas storage, liquefaction and pipeline facility) must file an Accidents Prevention Program ("PPA") with ASEA, outlining the possible risks and accidents that may occur during the operation phase of the project, and the adequate measures to tackle or minimize such risks.

Industrial, Operational, and Environmental Safety Management System

As set forth in Articles 12-19 of the law that created the ASEA (Ley de la Agencia Nacional de Seguridad Industrial y de Protección al Medio Ambiente del Sector Hidrocarburos), hydrocarbon projects (such as a natural gas storage and liquefaction plant and pipeline) must implement a Sistema de Administración de Seguridad Industrial, Seguridad Operativa y Protección al Medio Ambiente (Industrial, Operational, and Environmental Safety Management System, or "SASISOPA").

The SASISOPA is a technical tool designed to oversee a facility's industrial, operative and environmental operation during its entire life cycle, with the intention to detect risks, faults and improve its performance and overall safety.

The SASISOPA is filed with, approved and governed by ASEA which will regularly monitor this program's implementation and may request detailed reports on progress. As is the case with the EIA, noncompliance may result in hefty fines and the facility's closure.

Additionally, those who will develop a pipeline or liquefaction project must be registered under a Clave Única de Registro del Regulado (Unique Regulated Registry Number, or "CURR"), which is a code that allows the ASEA to identify who is requesting a specific authorization.

Waste Registrations and Management Plans

Those facilities that generate hazardous and special handling wastes must register before ASEA, outlining in their registry applications the type of waste and annual volumes that will be generated.

Furthermore, if at any time during the project's construction or operations phase, more than 10 tons of each strand of waste will be generated, a Waste Management Plan must be drafted and filed for approval before ASEA, as applicable. These Waste Management Plans outline the processes that generate the waste, providing the available measures for recycling, re-use or final disposition in appropriate landfills.

Comprehensive Environmental License

Those facilities subject to Federal jurisdiction (such as those pertaining to the hydrocarbons sector) that generate air emissions require a Licencia Ambiental Única (Comprehensive Environmental License, or "LAU") from ASEA.

The LAU outlines the processes that generate the emissions, as well as the kind of gasses generated, volumes and abatement measures.

If at any point of operations, processes change or emissions cease (or increase), the LAU must be updated.

Finally, between March and June of every year, a Cédula de Operación Anual (Annual Operation Schedule) must be filed before ASEA, reporting the air emissions, wastewater and hazardous waste generated during the previous calendar year.

Appendix E: Project Operational Emissions

FLNG BRAVO LNG Emissions Profile

Pollutant	Emissions (tons per year)
NOx	9.16
CO	18.28
VOCs	2.97
PM10/PM2.5	0.49
SO2	35.76
HAP	0.12
Pb	3.3E-05
H2SO4	2.77
CO2	92,222
CH4	27.68
N2O	0.01
GHGs (as CO2e)	92,918
H2S	0.194