

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

Texas LNG Brownsville LLC

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Docket No. 15-62-LNG

**REQUEST OF TEXAS LNG BROWNSVILLE LLC FOR EXTENSION OF TIME FOR
LONG-TERM AUTHORIZATION TO EXPORT LIQUIFIED NATURAL GAS TO
NON-FREE TRADE AGREEMENT NATIONS**

Pursuant to Section 3 of the Natural Gas Act (“NGA”)¹ and Part 590 of the Department of Energy’s (“DOE”) regulations,² Texas LNG Brownsville LLC (“Texas LNG”) submits this request (the “Request”) to the DOE Hydrocarbons and Geothermal Energy Office (“DOE/HGEO”)³ for an extension of the export commencement deadline applicable to the Non-Free Trade Agreement (“Non-FTA”) authorization issued to Texas LNG in Order No. 4489,⁴ as amended, in Docket No. 15-62-LNG. This Request pertains solely to Texas LNG’s Non-FTA authorization no. 4489, as Texas LNG’s Free Trade Agreement authorization does not contain a fixed deadline for the commencement of the export term and is not affected by this filing.⁵

¹ 15 U.S.C. § 717b(a).

² 10 C.F.R. Part 590.

³ The DOE Office of Fossil Energy (“DOE/FE”) changed its name to the Office of Fossil Energy and Carbon Management (“DOE/FECM”) on July 4, 2021. On November 20, 2025, DOE/FECM changed its name to the Hydrocarbons and Geothermal Energy Office (“HGEO”). To avoid confusion, Texas LNG uses the acronym in effect at the time of each action or order discussed herein.

⁴ *Texas LNG Brownsville LNG LLC*, Opinion and Order Granting Long-term Authorization to Export Liquified Natural Gas to Non-free Trade Agreement Nations, Order No. 4489, Docket No. 15-62-LNG (Feb. 10, 2020) (Non-FTA Authorization); *Texas LNG Brownsville LNG LLC*, Order Extending Export Term for Authorizations to Free Trade and Non-Free Trade Agreement Nations Through December 31, 2050, Order No. 4489-A, Docket No. 15-62-LNG (Dec. 10, 2020).

⁵ *Texas LNG Brownsville LNG LLC*, Opinion Granting Long-Term, Multi-Contract Authorization to Export Liquefied Natural Gas by Vessel from the Proposed LNG Terminal at the Port of Brownsville in Brownsville, Texas, to Free Trade Agreement Nations, Order No. 3716, Docket No. 15-62-LNG (Sept. 24, 2015).

For the reasons discussed below, Texas LNG respectfully requests that DOE/HGEO extend the deadline to commence export operations under this authorization from February 10, 2027, until February 10, 2032. Texas LNG also requests that DOE/HGEO grant the Project an additional three-year make-up period, consistent with recent precedent.

Texas LNG does not propose any change to the nature of its Project at this time, nor to its existing export authorizations, except for the 60-month extension of its deadline to commence export authorizations pursuant to its Non-FTA Authorization. As discussed below, Texas LNG submits that good cause exists to grant this Request and that granting the Request is not inconsistent with the public interest.

In support of this Request, Texas LNG states as follows:

I. COMMUNICATIONS AND CORRESPONDENCE

Correspondence and communications regarding this Request should be addressed to the following and those designated with an (*) should be designated as the agent for service for Texas LNG:⁶

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⁶ Texas LNG respectfully requests a waiver of Section 590.202(a) of DOE/HGEO regulations, 10 C.F.R. § 590.202(a) (2026), to the extent necessary to include more than two persons on the official service list.

II. BACKGROUND

a. DOE Procedural History

Texas LNG is the owner and developer of a 4 million tonnes per annum (“MTPA”) export facility located at the Port of Brownsville, Texas (the “Project”). DOE authorized Texas LNG to export domestically produced LNG by vessel from the Project under the following orders:

- (i) DOE/FE Order No. 3716,⁷ as amended by Order No. 3716-A, authorizing exports in a volume equivalent to 204.4 billion cubic feet per year (“Bcf/yr”) of natural gas to any country with which the United States has, or in the future will have, a free trade agreement requiring national treatment for trade in natural gas pursuant to NGA section 3(c); and
- (ii) DOE/FE Order No. 4489,⁸ as amended by Order No. 4489-A, authorizing exports in a volume equivalent to 204.4 Bcf/yr of natural gas to any other country with which trade is not prohibited by U.S. law or policy, pursuant to NGA section 3(a).

Ordering Paragraph (B) of Order No. 4489 requires Texas LNG to commence commercial LNG export operations no later than seven years from the date of the order, i.e., by February 10, 2027. In Order No. 4489, DOE/FE explained that “[t]he purpose of this condition is to ensure that other entities that may seek similar authorizations are not frustrated in their efforts to obtain those authorizations by authorization holders that are not engaged in actual

⁷ *Texas LNG Brownsville LLC*, Order Granting Long-term, Multi-Contract Authorization to Export Liquefied Natural Gas by Vessel from the Proposed LNG Terminal at the Port of Brownsville, Texas, to Free Trade Agreement Nations, Order No. 3716, Docket No. 15-62-LNG (Sept. 24, 2015); *Texas LNG Brownsville LNG LLC*, Order Extending Export Term for Authorizations to Free Trade and Non-Free Trade Agreement Nations Through December 31, 2050, Order No. 3716-A, Docket No. 15-62-LNG (Dec. 10, 2020).

⁸ *Supra* note 3.

export operations.”⁹ On December 10, 2020, DOE/FE issued Order Nos. 3716-A and 4489-A, extending the export term under both authorizations through December 31, 2050, pursuant to DOE’s policy statement extending Non-FTA export terms for LNG authorizations to the year 2050.¹⁰ That amendment did not alter the February 10, 2027 export commencement deadline set forth in Order No. 4489.

b. FERC Procedural History

On November 22, 2019, the Federal Energy Regulatory Commission (“FERC”) issued an order in Docket No. CP16-116-000 authorizing Texas LNG to site, construct and operate the Project.¹¹ On December 23, 2019, a group of opponents jointly sought rehearing and stay of the FERC Authorization,¹² which FERC denied on February 21, 2020.¹³ The parties then petitioned for review of the FERC Authorization to the U.S. Court of Appeals for the D.C. Circuit (“D.C. Circuit”), which then remanded the FERC Authorization, without *vacatur*, back to FERC for further explanation of certain issues.¹⁴

⁹ Order No. 4489, at 50-51.

¹⁰ *Texas LNG Brownsville LLC*, Order Extending Export Term for Authorizations to Free Trade and Non-Free Trade Agreement Nations Through December 31, 2050, DOE/FE Order Nos. 3716-A, 4489-A, Docket No. 15-62-LNG (Dec. 10, 2020).

¹¹ *See Tex. LNG Brownsville LLC*, 169 FERC ¶ 61,130 (2019) (“FERC Authorization”), *order on reh’g*, 170 FERC ¶ 61,139 (2020), *remanded sub nom. Vecinos para el Bienestar de la Comunidad Costera v. FERC*, 6 F.4th 1321 (D.C. Cir. 2021), *on remand*, 183 FERC ¶ 61,047 (2023), *order on reh’g*, 185 FERC ¶ 61,079 (2023), *vacated and remanded sub nom. City of Port Isabel v. FERC*, 111 F.4th 1198 (D.C. Cir. 2024), *reh’g granted in part*, 130 F.4th 1034 (D.C. Cir. 2025) (remanding to the Commission for further consideration without *vacatur*), *on remand*, 192 FERC ¶ 61,170 (2025).

¹² Specifically, Sierra Club, Texas Rio Grande Legal Aid (on behalf of Shrimpers and Fisherman of the RGV and Vecinos para el Bienestar de la Comunidad Costera), Save RGV from LGV, Defenders of Wildlife, the City of South Padre Island, the City of Port Isabel, the Town of Laguna Vista, and affected landowners Cynthia and Gilberto Hinojosa (collectively, Vecinos Groups) filed a request for rehearing.

¹³ *Tex. LNG Brownsville LLC* 170 FERC ¶ 61,139 (2020)

¹⁴ *Vecinos para el Bienestar de la Comunidad Costera v. FERC*, 6 F.4th 1321 (D.C. Cir. 2021).

On April 21, 2023, FERC issued an order responding to the D.C. Circuit and upholding the FERC Authorization.¹⁵ Opponents then sought rehearing of the 2023 Remand Order, which FERC denied on October 27, 2023.¹⁶ Project opponents then petitioned for review of the 2023 Remand Order to the D.C. Circuit, which the D.C. Circuit then remanded and vacated on August 6, 2024.¹⁷ On March 18, 2025, the D.C. Circuit partially granted the petitions for panel rehearing of the August 6, 2024 opinion,¹⁸ granting partial rehearing and remanding the case to FERC without vacatur.¹⁹ Additionally, on May 24, 2024, Texas LNG requested an extension of time, until November 22, 2029, to construct the Project and place it into service.

On August 21, 2025, FERC issued an order responding to the D.C. Circuit's second remand, again finding that the project was not inconsistent with the public interest and upholding the FERC Authorization.²⁰ No requests for rehearing of the 2025 Order on Remand were filed, and therefore the FERC Authorization is now final and nonappealable. The 2025 Order on Remand also granted Texas LNG a five-year extension of time, until November 22, 2029, to construct and place the Project in service. In granting the extension, FERC found that Texas LNG had demonstrated good cause to extend the deadline, principally due to litigation delays, and that Texas LNG had continued to develop the project despite these delays.²¹

III. AUTHORIZATION REQUESTED

Texas LNG herein requests that the start date of the term of the authorization as specified in Ordering Paragraph (B) of Order No. 4489 be extended by approximately 60 months, from

¹⁵ *Tex. LNG Brownsville LLC*, 183 FERC ¶ 61,047 (2023) (“2023 Remand Order”).

¹⁶ *Tex. LNG Brownsville LLC*, 185 FERC ¶ 61,079 (2023).

¹⁷ *City of Port Isabel v. FERC*, 111 F.4th 1198 (D.C. Cir. 2024)

¹⁸ *Port Isabel II*, 130 F.4th 1034.

¹⁹ *Id.* at 1038.

²⁰ *Tex. LNG Brownsville LLC*, 192 FERC ¶ 61,170 (2025) (“2025 Order on Remand”).

²¹ *Id.* at P 62-63.

February 10, 2027 to February 10, 2032. Texas LNG requests this extension to ensure the terms of its Non-FTA authorization accommodates its current construction schedule and its Non-FTA authorization remains valid during construction and commissioning, until the Project is ready to commence exports of LNG. Nothing in this Request is intended to supersede or otherwise modify the export authorization granted to Texas LNG in Order No. 4489, with the exception of the extension discussed herein.

IV. DISCUSSION

a. Standard of Review

Under Section 3 of the NGA, as amended, an application for authorization to export natural gas, including LNG, to any nation with which there is not in effect a treaty requiring national treatment for trade in natural gas, shall be granted “unless, after opportunity for hearing, [DOE/HGEO] finds that the proposed exportation . . . will not be consistent with the public interest.”²² This statutory language has long been interpreted to create a presumption in favor of LNG exports.²³ Under this statutory framework, DOE/HGEO found that Texas LNG’s exports of LNG were consistent with the public interest.²⁴ This Request does not modify or otherwise impact the public interest analysis in Order No. 4489.

Historically, DOE/HGEO has granted requests to extend the commencement of service deadlines for Non-FTA export authorizations where the requesting party demonstrates that good cause exists to grant the extension, and where the request does not seek to modify the proposal

²² 15 U.S.C. § 717b(a).

²³ *Sierra Club v. United States Dep’t of Energy*, 867 F.3d 189, 203 (D.C. Cir. 2017) (“We have construed this as containing a “general presumption favoring [export] authorization”) (citing *W. Va. Pub. Servs. Comm’n v. U.S. Dep’t of Energy*, 681 F.2d 847, 856 (D.C. Cir. 1982); see also *For a Better Bayou v. FERC*, No. 24-1291 (D.C. Cir. 2026).

²⁴ Order No. 3909 at 157; Order No. 3909-C at 60.

beyond the commencement of service deadline so as to impact DOE/HGEO's prior public interest finding.²⁵ As DOE has explained, to demonstrate good cause, "it is sufficient for an authorization holder to demonstrate that it has made good faith efforts to meet its existing export commencement deadline but encountered circumstances that prevented it from doing so."²⁶ DOE recently reaffirmed that going forward it "will consider applications to extend an authorization holder's export commencement deadline and grant such extensions for good cause shown on a case-by-case basis."²⁷ As demonstrated below, good cause exists to grant this Request, and doing so will have no impact on DOE's underlying public interest finding.

b. Good Cause Exists to Grant the Extension of Time

Since the issuance of Order No. 4489, Texas LNG has proceeded diligently to advance the Project toward a positive final investment decision ("FID"), and, ultimately, long-term export of LNG in the quantities authorized by DOE. As has been documented in Texas LNG's semi-annual reports to DOE, Texas LNG has been actively developing the project and is rapidly progressing toward FID.²⁸ More recently, Texas LNG issued a Limited Notice to Proceed

²⁵ See e.g., *Cameron LNG, LLC*, DOE/FE Order No. 3849-A, FE Docket No. 15-90, Order Granting Application for Extension of Commencement Deadlines (November 2, 2020); *Golden Pass LNG Terminal LLC*, DOE/FE Order No. 3978-C, FE Docket No. 12-156-LNG, Order Granting Request for Extension of Export Commencement Deadlines (March 24, 2020 ("Order No. 3978-C")).

²⁶ *Lake Charles LNG Export Co., LLC*, DOE/FECM Order Nos. 3868-E and 4010-E, Docket Nos. 13-04-LNG and 16-109-LNG, Order Amending Long-Term Authorizations to Export Liquefied Natural Gas to Non-Free Trade Agreement Countries, at 35 (Aug. 22, 2025).

²⁷ U.S. Dep't of Energy, *Rescission of Policy Statement on Export Commencement Deadlines in Authorizations to Export Natural Gas to Non-Free Trade Agreement Countries*, 90 Fed. Reg. 14,411 (Apr. 2, 2025) ("Rescission Notice"). Previously, on April 21, 2023, DOE issued a "Policy Statement on Export Commencement Deadlines" for non-FTA authorizations ("Policy Statement"), which established mandatory criteria that an authorization holder must meet for DOE to consider an export commencement extension. However, on April 2, 2025, DOE rescinded the Policy Statement in the Rescission Notice, stating that DOE was returning to its prior practice of granting such extensions upon a showing of good cause on a case-by-case basis. *Id*

²⁸ U.S. Dep't of Energy, *Semi-Annual Reports for Texas LNG Brownsville LLC – Dkt No. 15-62-LNG* (last visited Aug. 25, 2026), <https://www.energy.gov/hgeo/articles/semi-annual-reports-texas-lng-brownsville-llc-dkt-no-15-62-lng>.

(“LNTP”) to EPC Contractor Kiewit in July 2026, covering purchase orders for long-lead equipment, EPC-phase engineering, and geotechnical work. In July 2026, Glenfarne also announced a \$500 million investment led by HPS Investment Partners (part of BlackRock) to support continued development and early pre-construction activities, which was a critical step for Texas LNG to achieve FID.

However, these good faith efforts to develop the Project on its initial timeline have been substantially frustrated by extenuating circumstances outside of Texas LNG’s control. Most significantly, and as discussed above, Texas LNG has endured six years of sustained litigation and remand proceedings challenging FERC’s authorization of the Project (including two separate challenges at the D.C. Circuit Court of Appeals), together with separate litigation proceedings challenging an air permit issued by the Texas Commission on Environmental Quality in May 2020, which were not fully resolved until January 2026.²⁹ Texas LNG expended significant time, energy, and resources defending its FERC Authorization and Texas state air permit.

Despite Texas LNG’s best efforts, development of the Project was unavoidably delayed due to such substantial litigation. Although FERC’s underlying authorization of the Project was never formally stayed or enjoined during this litigation, the operative harm to the Texas LNG Project was the multi-year uncertainty created by the pendency of unresolved judicial challenges to the authorizations on which the Project depends. This uncertainty made it more difficult for Texas LNG to secure the long-term financing and commercial commitments necessary to reach

²⁹ *Tex. Comm’n on Env’tl. Quality v. Vecinos Para El Bienestar De La Comunidad Costera*, No. 03-21-00395-CV (Tex. 3d Ct. of Appeals 2023); *S. Tex. Env’tl Justice Network v. Tex. Comm’n on Env’tl. Quality*, 165 F.4th 356 (2026).

FID and meet its current export commencement deadline. DOE has previously found good cause for an extension where a project's development was impaired by regulatory delays.³⁰

In light of these delays, Texas LNG sought and obtained from FERC a five-year extension, until November 22, 2029, of its deadline to complete construction of the Project and make it available for service.³¹ In granting the extension, FERC found that such substantial litigation delays were an appropriate basis to find good cause to grant an extension.³² While DOE has its own independent responsibility to evaluate requests to extend commencement of service deadlines, Texas LNG notes that DOE has previously explained that FERC's grant of an extension is a "compelling factor" in its own good cause analysis.³³ Accordingly, Texas LNG respectfully requests that DOE/HGEO extend the deadline under Order No. 4489 to commence commercial LNG export operations until February 10, 2032, for good cause shown.

c. Granting the Extension of Time is in the Public Interest

In addition to the existence of good cause for the requested extension, an extension is in the public interest and does not alter DOE/HGEO's prior finding that the Texas LNG's proposed exports are not inconsistent with the public interest. As set forth in Executive Order 14154,

³⁰ See e.g. *Lake Charles LNG Export Company, LLC*, Order Denying Request for Rehearing of Order Amending Long-Term Authorizations to Export Liquefied Natural Gas to Non-Free Trade Agreement Countries, Docket Nos. 13-04-LNG;16-109-LNG, at 31-32 (Oct. 17, 2025); *Louisiana LNG Infrastructure LLC*, DOE/FECM Order No. 4373-C, Docket No. 16-144-LNG, Order Amending Long-Term Authorization to Export Liquefied Natural Gas to Non-Free Trade Agreement Countries (Dec. 16, 2025).

³¹ 2025 Remand Order, 192 FERC ¶ 61,170 at P 63.

³² *Id.*

³³ See, e.g., *Freeport LNG Expansion, L.P. & FLNG Liquefaction 4, LLC*, DOE/HGEO Order No. 4374-B, Docket No. 18-26-LNG, at 11 (May 26, 2026); *Gulf LNG Liquefaction Company, LLC*, Order Amending Long-Term Authorization to Export Liquefied Natural Gas to Non-Free Trade Agreement Countries, Order No. 4410-B, at 10 (July 28, 2026); *Louisiana LNG Infrastructure LLC*, Order Amending Long-Term Authorization to Export Liquefied Natural Gas to Non-Free Trade Agreement Countries, DOE/FECM Order No. 4373-C, Docket No. 16-144-LNG, at 9 (Dec. 16, 2025).

granting and maintaining authorizations to export LNG comes with “economic and employment impacts to the United States and the impact to the security of allies and partners,” and the same positive impacts will result from preventing Texas LNG’s authorization from lapsing.³⁴ To the contrary, a failure to extend the deadline would “unduly burden the development of domestic energy resources,” specifically natural gas, inconsistent with the findings in DOE’s Recission Notice. Further, while DOE/HGEO initially imposed the export commencement deadline to ensure that other applicants seeking export authorizations were not frustrated in those efforts, Texas LNG is aware of no other entity whose efforts to acquire an export authorization are barred by Texas LNG’s possession of the instant authorization.

Texas LNG’s requested extension is consistent with commencement deadline extensions of comparable duration and character recently granted to Non-FTA authorization holders, including a 44-month extension granted to Louisiana LNG,³⁵ a five-year extension granted to Gulf LNG Liquefaction Company, LLC,³⁶ and a nearly seven-year extension granted to Cameron LNG, LLC.³⁷ For the foregoing reasons, Texas LNG respectfully submits that good cause exists to extend its export commencement deadline until February 10, 2032, and its requested extension is not inconsistent with the public interest.

³⁴ Executive Order 14154, 90 Fed. Reg. at 8353.

³⁵ *Louisiana LNG Infrastructure LLC*, DOE/FECM Order No. 4373-C, Docket No. 16-144-LNG, Order Amending Long-Term Authorization to Export Liquefied Natural Gas to Non-Free Trade Agreement Countries (Dec. 16, 2025).

³⁶ *Gulf LNG Liquefaction Company, LLC*, Order Amending Long-Term Authorization to Export Liquefied Natural Gas to Non-Free Trade Agreement Countries, Order No. 4410-B (July 28, 2026).

³⁷ *Cameron LNG, LLC*, DOE/HGEO Order No. 3846-C, Docket No. 15-90-LNG, Order Amending and Partially Vacating Long-Term Authorization to Export Liquefied Natural Gas to Non-Free Trade Agreement Countries (Apr. 30, 2026) (extending Cameron LNG’s export commencement deadline from May 5, 2026, to March 16, 2033, consistent with a related FERC construction deadline extension).

Granting Texas LNG's requested extension will not disturb DOE/HGEO's underlying public interest determinations regarding the Non-FTA Authorization as no facts or requirements associated with the Non-FTA Authorization would be affected by the requested extension beyond the additional time period to commence operations.³⁸ Thus, DOE/HGEO's prior public interest analysis in Order No. 4489 is not implicated by this Request, and need not be revisited by DOE/HGEO in granting the Request.

V. REQUEST FOR THREE-YEAR MAKE-UP PERIOD

On December 10, 2020, as it did for other long-term export authorizations, DOE/HGEO issued an order extending the export terms for the Texas LNG Project through December 31, 2050.³⁹ If DOE/HEGEO grants the commencement extension requested herein, it is likely that a term ending on December 31, 2050, would be less than 20 years, which is the industry standard for the long-term LNG sale and purchase agreements that support financing of LNG export terminal such as the Texas LNG Project.

Consistent with DOE's longstanding practice under the 2050 Policy Statement,⁴⁰ and recent precedent,⁴¹ Texas LNG hereby requests a three-year, post-term make-up period. Granting this make-up period is consistent with recent DOE precedent recognizing that it is in the public

³⁸ See *Cameron LNG, LLC*, DOE/HGEO Order No. 3846-C, Docket No. 15-90-LNG, Order Amending and Partially Vacating Long-Term Authorization to Export Liquefied Natural Gas to Non-Free Trade Agreement Countries, at 9-14 (Apr. 30, 2026); *Port Arthur LNG, LLC*, DOE/FECM Order No. 3698-C & 4372-B, Docket Nos. 15-53-LNG, 15-96-LNG, 18-162-LNG, at 13 (Apr. 21, 2023).

³⁹ *Texas LNG Brownsville LLC*, Order Extending Export Term for Authorizations to Free Trade and Non-Free Trade Agreement Nations Through December 31, 2050, DOE/FE Order Nos. 3716-A, 4489-A, Docket No. 15-62-LNG (Dec. 10, 2020).

⁴⁰ U.S. Dep't of Energy, Extending Natural Gas Export Authorizations to Non-Free Trade Agreement Countries Through the Year 2050; Notice of Final Policy Statement and Response to Comments, 85 Fed. Reg. 52,237 (Aug. 25, 2020).

⁴¹ See *Cameron LNG, LLC*, DOE/HGEO Order No. 3846-C, Docket No. 15-90-LNG, at 15-17 (Apr. 30, 2026) (declining to adopt the "later of twenty years or December 31, 2050" extension request while granting a three-year make-up period through December 31, 2053).

interest under NGA section 3(a) and consistent with Executive Order 14154, *Unleashing American Energy*, to allow a project three additional years for export of approved volumes beyond December 31, 2050, and further that it is “reasonable” to reinstate a three-year makeup period, through December 31, 2053, for other Non-FTA authorization holders as well.⁴²

VI. APPENDICES

The following appendices are included with this application:

Appendix A	Verification Statement
Appendix B	Opinion of Counsel

VII. CONCLUSION

For the foregoing reasons, Texas LNG respectfully requests that DOE/HGEO amend Ordering Paragraph (B) of Order No. 4489 to extend Texas LNG's export commencement deadline from February 10, 2027, until February 10, 2032, and to grant a three-year make-up period through December 31, 2053.

Respectfully submitted,

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Dated: September 28, 2026

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⁴² See *id.*; *Port Arthur LNG Phase II, LLC*, Order Amending Long-Term Authorization to Export Liquefied Natural Gas to Non-Free Trade Agreement Nations at 3-5, Order No. 5292-A, Docket No. 20-23-LNG (June 30, 2025).

CERTIFICATE OF SERVICE

I certify that I have this 28th day of September, 2026, serviced copies of the foregoing document filed with DOE/FE on the designated representatives of all of the parties to this proceeding, in accordance with 10 C.F.R. § 590.107(a)

/s/ Timothy J. Furdyna

Timothy J. Furdyna

Counsel for Texas LNG Brownsville LLC

APPENDIX A
VERIFICATION STATEMENT

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

In the Matter of	)	
Texas LNG Brownsville LLC	)	DOE/HGEO Docket No. 15-62-LNG
	)	

VERIFICATION

I, Vlad Bluzer, declare that I am President of Texas LNG Brownsville 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 The Woodlands, Texas on September 28, 2026.

/s/ Vlad Bluzer
Vlad Bluzer
President
Texas LNG Brownsville LLC

APPENDIX B
OPINION OF COUNSEL

September 28, 2026

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Ms. Amy Sweeney
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**Re: Texas LNG Brownsville LLC
HGEO Docket No. 15-62-LNG
Request for Extension of Non-FTA Authorization Export Commencement Deadline**

Dear Ms. Sweeney:

This opinion of counsel is submitted pursuant to Section 590.202(c) of the regulations of the United States Department of Energy, 10 C.F.R. § 590.202(c), in connection with the request of Texas LNG Brownsville LLC ("Texas LNG") for a limited extension of the state date for the term of its authorization to export liquefied natural gas to nations with which the United States does not have a free trade agreement ("Extension of Time Request"). I am counsel to Texas LNG. I have reviewed and relied upon the organizational documents of Texas LNG, and it is my opinion that the proposed Extension of Time Request as described in the application filed by Texas LNG, to which this Opinion of Counsel is attached as Appendix B, is within the company powers of Texas LNG.

Any questions regarding this correspondence or the application, including the appendices thereto, may be directed to me at (202) 778-9168 or at tim.furdyna@klgates.com.

Respectfully submitted,

/s/ Timothy J. Furdyna
Timothy J. Furdyna
Counsel for Texas LNG Brownsville LLC