RECEIVED
By Docket Room at 3:36 pm, Nov 05, 2026

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

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

APPLICATION OF VENTURE GLOBAL CP2 LNG, LLC FOR BLANKET AUTHORIZATION TO EXPORT PREVIOUSLY IMPORTED LIQUEFIED NATURAL GAS BY VESSEL FROM TERMINAL IN CAMERON PARISH, LOUISIANA

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

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

Ammaar Joya
Latham & Watkins LLP
811 Main Street
Suite 3700
Houston, TX 77002
Telephone: (713) 546-7436
ammaar.joya@lw.com

Filed: November 5, 2026

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

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

APPLICATION OF VENTURE GLOBAL CP2 LNG, LLC FOR BLANKET AUTHORIZATION TO EXPORT PREVIOUSLY IMPORTED LIQUEFIED NATURAL GAS BY VESSEL FROM TERMINAL IN CAMERON PARISH, LOUISIANA

Pursuant to Section 3 of the Natural Gas Act ("NGA")[1] and Part 590 of the Department of Energy's ("DOE") regulations,[2] Venture Global CP2 LNG, LLC ("CP2 LNG") hereby files this application ("Application") with the Hydrocarbons and Geothermal Energy Office of the DOE ("DOE/HGEO")[3] for short-term, blanket authorization to export pursuant to transactions with terms of no longer than two years liquefied natural gas ("LNG") that has been previously imported to the United States from foreign sources. Specifically, CP2 LNG requests blanket authorization to export by vessel from its LNG export terminal under construction on the east side of the Calcasieu Ship Channel, and the nearby Monkey Island, in Cameron Parish, Louisiana (the "Export Terminal") previously imported LNG in volumes of up to the equivalent of 6.0 billion cubic feet ("Bcf") of natural gas over a two-year period commencing upon issuance of the authorization. As explained below, CP2 LNG seeks this authorization to allow it to re-export natural gas imported to the Export Terminal as part of the cool-down of Export Terminal facilities during the start-up and commissioning of those facilities. The requested authorization

---

1 15 U.S.C. § 717b (2018).

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

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

for re-exports does not involve the construction of any new or additional facilities, nor any physical modification to the Export Terminal or its operations. CP2 LNG respectfully requests that DOE grant this Application by January 15, 2027, to ensure that CP2 LNG has the necessary authorization before it would be prepared to export any previously imported LNG.

CP2 LNG requests this blanket authorization solely for LNG previously imported by vessel at the Export Terminal from foreign sources because its long-term authorizations encompass short-term exports of domestically produced natural gas.[4] CP2 LNG requests the new blanket authorization for short-term re-exports to any country with the capacity to import LNG via ocean-going carrier and with which trade is not prohibited by U.S. law or policy, whether or not the country has an FTA with the United States requiring national treatment for trade in natural gas: in other words, for exports to both FTA and non-FTA countries. Given the small volume of the proposed exports here, and because approval of the Application does not require an environmental impact statement ("EIS") or an environmental assessment ("EA") under the National Environmental Policy Act ("NEPA"), the proposed exports may be deemed consistent with the public interest under the criteria set forth in Sections 590.102(p) and 590.208(a) of DOE's regulations.[5] In light of certain orders granting blanket authorizations for re-exports by other LNG terminals issued by DOE, CP2 LNG commits that the volumes exported under the requested blanket authorization when added to volumes exported under CP2 LNG's existing long-term authorizations will not exceed the annual quantities authorized by DOE in those long-term authorizations. CP2 LNG requests this authorization both on its own behalf and when acting as agent on behalf of other entities who

---

[4] *See* DOE Order No. 4812, *Order Granting Long-Term Authorization to Export Liquefied Natural Gas to Free Trade Agreement Nations*, DOE Docket No. 21-131-LNG (Apr. 22, 2022); DOE Order No. 5264-A, *Final Order Granting Long-Term Authorization to Export Liquefied Natural Gas to Non-Free Trade Agreement Nations*, DOE Docket No. 21-131-LNG (Oct. 21, 2025), *reh'g denied*, Order No. 5264-B (Mar. 26, 2026), *appeal pending sub nom. Sierra Club, et al. v. Chris Wright; U.S. Dep't of Energy,* Case No. 26-1035 (D.C. Cir. filed Feb. 17, 2026).

[5] 10 C.F.R. §§ 590.102(p), 590.208(a); see also U.S. Dep't of Energy, Small-Scale Natural Gas Exports; Final Rule, 83 Fed. Reg. 35,106 (July 25, 2018) (the "Small-Scale Rule").

themselves may hold title to the LNG at the time of export, after registering each such entity with DOE in accordance with the established procedures.

In support of this Application, CP2 LNG respectfully shows as follows:

I. DESCRIPTION OF THE APPLICANT

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

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

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

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

II. COMMUNICATIONS AND CORRESPONDENCE

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

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

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

Ammaar Joya
Latham & Watkins LLP
811 Main Street
Suite 3700
Houston, TX 77002
Telephone: (713) 546-7436
ammaar.joya@lw.com

These individuals are designated to receive service and should be placed on the official service list for this proceeding.

III. BACKGROUND AND EXISTING AUTHORIZATIONS

The CP2 LNG Export Terminal currently under construction is located on an approximately 737.3-acre site on the east side of the Calcasieu Ship Channel, in Cameron Parish, Louisiana. The Project, as currently authorized by FERC, has a nameplate liquefaction and export capacity of 20.0 million metric tonnes per annum ("MTPA") and a peak achievable capacity of 28.0 MTPA.[6] The

[6] *Venture Global CP2 LNG, LLC; Venture Global CP Express, LLC,* 187 FERC ¶ 61,199 (2024) (the "Authorization Order"), *reh'g*, 189 FERC ¶ 61,148 (2024), *reh'g*, 191 FERC ¶ 61,153 (2025), *reh'g and stay denied*, 192 FERC ¶ 61,155 (2025), *aff'd sub nom. For a Better Bayou v. FERC*, __ F.4th __, 2026 WL 2484310 (D.C. Cir. 2026).

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

In Docket No. 21-131-LNG, DOE granted CP2 LNG long-term, multi-contract authority to export LNG from its Export Terminal to FTA nations in DOE/FECM Order No. 4812 on April 22, 2022. In the same docket, DOE conditionally authorized exports by CP2 LNG to non-FTA nations in DOE/FECM Order No. 5264 issued on March 19, 2025. In that conditional authorization, DOE explained that it had recently undertaken a study evaluating exports of domestically produced LNG, entitled 2024 LNG Export Study: Energy, Economic, and Environmental Assessment of U.S. LNG Exports ("2024 LNG Export Study"), and that the public comment period for it remained open. After completing its consideration of the 2024 LNG Export Study, DOE granted final authorization of the exports by CP2 LNG to non-FTA nations in DOE/FECM Order No. 5264-A issued on October 21, 2025, and then denied rehearing in DOE/HGEO Order No. 5264-B on March 26, 2026. Those orders authorize CP2 LNG to export LNG to both FTA and non-FTA nations in a volume equivalent to 1,446 Bcf/year (on a non-additive basis), which is approximately 28.0 MTPA of LNG.

CP2 LNG has entered into binding, long-term LNG Sales and Purchase Agreements ("SPAs") for nearly all of its nameplate liquefaction capacity with major international companies, as well as contracts for all excess LNG produced above the nameplate capacity. All of these long-term SPAs have been filed

by CP2 LNG with DOE in accordance with the requirements of its export authorizations and DOE policies.[7]

On July 28, 2025, Venture Global announced its final investment decision (FID) and the closing of the $15.1 billion project financing for the initial phase of the CP2 LNG Project (which includes 14.4 MTPA of nameplate capacity) and the affiliated CP Express Pipeline.[8] The FERC Staff issued its first notices to proceed for CP2 LNG on May 30, 2025, and it has subsequently issued numerous additional notices to proceed for CP2 LNG to proceed with construction. On March 13, 2026, Venture Global announced the FID for the second phase of the CP2 LNG Project, with the successful closing of an additional $8.6 billion project financing.[9] As they receive the necessary authorizations from FERC Staff, CP2 LNG and Venture Global CP Express, LLC ("CP Express") are both proceeding with construction of the entire project so as to commence operations safely and as quickly as feasible. Details regarding the status of the ongoing construction of the Export Terminal are available in the numerous filings and issuances in FERC Docket No. CP22-21, including in monthly status reports.

On December 29, 2025, CP2 LNG filed an application with FERC requesting to amend its authorizations for the CP2 LNG Export Terminal to increase the authorized peak liquefaction capacity achievable from 28.0 MTPA to 35.0 MTPA, which is pending in FERC Docket No. CP26-55. That proposed increase in the authorized peak liquefaction capacity reflects refinements in the conditions and assumptions concerning the maximum potential output of the already authorized facilities; it does not involve the construction of any new facilities or modification of the already authorized facilities. CP2

---

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

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

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

LNG submitted a corresponding application to the DOE on February 20, 2026, in which it requested that its existing authorizations to export LNG to both FTA and non-FTA countries be increased from 1,446 Bcf/year of natural gas (approximately 28.0 MTPA of LNG) to 1,873 Bcf/year (or approximately 35.0 MTPA).[10] As requested in its February 20, 2026 application, DOE amended CP2 LNG's authorization for exports to FTA countries to increase the authorized volumes to 1,873 Bcf/year;[11] the non-FTA portion of the application remains pending.

In addition, on May 26, 2026, CP2 LNG and its affiliated pipeline, CP Express, filed a joint application with the Commission for authorization of the CP2 LNG Expansion Project, the terminal portion of which would add approximately 11.7 MTPA of incremental peak liquefaction and export capacity at the Export Terminal through the addition of six liquefaction blocks and associated facilities.[12] CP2 LNG submitted a corresponding application to the DOE on July 7, 2026 in which it requested authorization to export an additional 620.5 Bcf per year (approximately 11.7 MTPA of LNG) from the Export Terminal to both FTA and non-FTA nations, on a non-additive basis;[13] this application remains pending before the DOE.[14]

Given the ongoing progress of construction of the Export Terminal, CP2 LNG currently expects it will begin producing LNG in the second half of 2027. As part of the start-up of its Export Terminal

---

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

[11] DOE Order No. 4812-A, DOE Docket No. 21-131-LNG (June 17, 2026).

[12] FERC Accession No. 20260526-5252. The joint application of CP2 LNG and CP Express is pending in FERC Docket Nos. CP26-530-000 and CP26-533-000.

[13] Assuming that DOE first approves the CP2 LNG uprate application, as filed on February 20, 2026, the resulting total authorized exports from the Terminal after action on this Application will be 2,493.5 Bcf per year (*i.e.*, the currently authorized amount of 1,446 Bcf plus the 427 Bcf associated with the previously filed uprate plus the 620.5 Bcf related to the CP2 LNG Expansion Project Application submitted to DOE on July 7, 2026).

[14] Application of Venture Global CP2 LNG, LLC for Authorization to Export Liquefied Natural Gas to Free Trade and Non-Free Trade Agreement Nations, filed in Docket No. 26-78-LNG, *available at* https://www.energy.gov/sites/default/files/2026-07/CP2%20Expansion%20DOE%20Application%20%28070726%20NEW%20FINAL%29_Verification%20OoC.pdf.

facilities, certain facilities will need to be cooled down for cryogenic operations. CP2 LNG has determined that the optimal method for this part of the start-up of its Export Terminal facilities is to import foreign sourced LNG by vessel and it may receive up to three LNG carrier cargos for this purpose. Accordingly, CP2 LNG recently submitted an application for short-term/blanket authorization to import natural gas by vessel from various sources, using the e-filing internet application process available on DOE's website.[15] CP2 LNG requested that import authorization to be effective by January 15, 2027, and to authorize imports of up to 6.0 Bcf of natural gas over the two-year period covered by the blanket authorization. CP2 LNG anticipates that all of its LNG imports will occur within three to four months, as part of its start-up and cool-down operations, and the requested volume allows for the receipt of up to three carrier cargos for that purpose. Because at least some portion of the imported LNG will subsequently be re-exported, CP2 LNG requests this authorization.

IV. AUTHORIZATION REQUESTED

CP2 LNG respectfully requests blanket authorization to allow it to export from its Export Terminal, pursuant to transactions with terms of no longer than two years, LNG that has been previously imported to the United States from foreign sources. CP2 LNG requests the blanket authorization to export previously imported LNG in volumes up to the equivalent of 6.0 Bcf of natural gas in total over the two-year period. CP2 LNG proposes that the term of the new authorization commence on the date of issuance of the new authorization, and respectfully requests that DOE/HGEO grant this requested authorization by January 15, 2027 to ensure that it will be in place prior to any potential export of the LNG that CP2 LNG plans to import as part of its start-up and commissioning operations.

CP2 LNG requests authorization to re-export this volume of LNG to both (1) any country which has, or in the future develops, the capacity to import LNG via ocean-going carriers and with which the U.S. has, or in the future enters into, an FTA requiring the national treatment for trade in natural gas or is otherwise deemed by the United States as being treated as an FTA nation, and (2) any country with the

[15] *See* https://www.energy.gov/hgeo/current-e-filing-instructions-natural-gas-authorizations.

capacity to import LNG via ocean-going carriers and with which the United States does not have such an FTA but with which trade is not prohibited by United States law or policy. In other words, CP2 LNG seeks blanket authorization for re-exports to both FTA countries and non-FTA countries.

CP2 LNG anticipates that it will hold title to the LNG being re-exported at the time of export. To promote flexibility, however, CP2 LNG requests the blanket authorization to re-export LNG apply on its own behalf and when acting as agent for entities with which it would contract that hold title to the LNG at the time of export – just as in CP2 LNG's existing long-term export authorizations.[16] CP2 LNG will comply fully with all applicable DOE/HGEO requirements when acting as an agent for others, as required in CP2 LNG's existing export authorizations and further explained in the Freeport LNG Development, L.P. and Gulf Coast LNG Export LLC orders.[17] Thus, when acting as an agent, CP2 LNG will register with DOE/HGEO each LNG title holder for which it seeks to export LNG as agent, and will provide the DOE/HGEO a written statement by the title holder that acknowledges and agrees to (1) comply with all requirements in CP2 LNG's export authorization, and (2) include those requirements in any subsequent purchase or sale agreement entered into by the title holder.

The authorized export volumes for re-exports *ought* not need to be limited by the level of authorized long-term exports. The volume limitation in the long-term export authorization is based on the liquefaction production capacity of the Export Terminal, which is irrelevant to volumes that have been previously imported from foreign sources. Furthermore, exports of previously-imported LNG do not reduce the availability of domestically produced natural gas – lessening any potential public interest concerns about the exports.

Nevertheless, CP2 LNG commits that the volumes re-exported under the requested blanket authorization will not be additive to the authorized long-term volumes. Thus, the volume of short-term re-

---

[16] *See* DOE Order No. 4812 (FTA) and DOE Order No. 5264-A (non-FTA), both in DOE Docket No. 21-131-LNG.

[17] *Freeport LNG Expansion, L.P. and FLNG Liquefaction, LLC*, FE Order No. 2913 (Feb. 10, 2011) (establishing the criteria for exports for agents subsequently adopted in a number of orders); *Gulf Coast LNG Export LLC*, DOE/FE Order No. 3163 at 7-8 (Oct. 16, 2012) (reiterating and explaining agency policy).

exports (which will not exceed 6.0 Bcf) when added to the volumes exported under CP2 LNG's long-term export authorizations will not exceed the authorized, total long-term exports during any consecutive 12-month period. CP2 LNG proposes the application of this volume limitation given certain DOE precedent on re-export authorizations,[18] so as to facilitate and expedite the timely approval of this Application.

V. CONSISTENCY WITH THE PUBLIC INTEREST

Section 3(c) of the NGA, as amended by § 201 of the Energy Policy Act of 1992, requires that applications to authorize exports of natural gas, including LNG, to a nation with which there is in effect an FTA requiring national treatment for trade of natural gas be "deemed to be consistent with the public interest" and "granted without modification or delay."[19] In addition, DOE has held that the statutory requirement for granting FTA applications without delay or modification overrides otherwise applicable regulatory requirements for public notice and other procedures set forth in 10 C.F.R. Part 590. Under this statutory regime, the portion of this Application that requests blanket authorization to re-export LNG from the CP2 LNG Export Terminal to FTA countries should be granted without modification or delay, consistent with the DOE's established practice.

With respect to exports to non-FTA countries, Section 3(a) of the NGA, sets forth the following statutory standard:

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

---

[18] *See, e.g.*, *Cove Point LNG, LP*, DOE/HGEO Order No. 5436 (June 25, 2026); *Sabine Pass Liquefaction, LLC*, DOE/HGEO Order No. 5432 (June 5, 2026); *Carib Energy (USA) LLC*, DOE/HGEO Order No. 5406 (Apr. 6, 2026); *Golden Pass LNG Terminal, LLC*, DOE/FECM Order No. 5340 (Sept. 22, 2025); *Venture Global Plaquemines LNG, LLC*, DOE/FECM Order No. 5143 (July 11, 2024); *Southern LNG Co., LLC*, DOE/FECM Order No. 4982 (Mar. 15, 2023); *Cove Point LNG, LP,* DOE/FECM Order No. 4849 (July 8, 2022); *Southern LNG Co., LLC*, DOE/FE Order No. 4687 (Mar. 30, 2021); *Sabine Pass Liquefaction, LLC*, Order No. 4545 (June 4, 2020); *Cameron LNG, LLC*, Order No. 4425 (Aug. 21, 2019); *Freeport LNG Development, L.P.*, Order No. 4424 (Aug. 21, 2019); *Sabine Pass Liquefaction, LLC*, Order No. 4197 (June 4, 2018).

[19] 15 U.S.C. § 717b(c).

> whole or in part, with such modification and upon such terms and conditions as the [Secretary] may find necessary or appropriate.[20]

This statutory language creates a presumption that the proposed export of natural gas is in the public interest. DOE has consistently held that it must grant export applications unless opponents of the application overcome this presumption by making an affirmative demonstration that the proposed export is inconsistent with the public interest.[21] This interpretation has been affirmed by the U.S. Court of Appeals for the D.C. Circuit.[22]

The Policy Guidelines developed by DOE to implement NGA Section 3 (which are applicable to exports as well as imports)[23] promote the free and open trade of natural gas.[24] The Policy Guidelines were "designed to establish natural gas trade on a market-competitive basis and to provide immediate as well as long-term benefits to the American economy from this trade."[25] Moreover, the Guidelines provide that:

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

---

[20] 15 U.S.C. § 717b(a). The Secretary's authority was established by the DOE Organization Act of 1977, which transferred jurisdiction over gas import and export authorizations from the Federal Power Commission.

[21] *E.g.*, *Philips Alaska Natural Gas Corp. and Marathon Oil Co.*, DOE/FE Order No. 1473 at 13 (Apr. 2, 1999); *Sabine Pass Liquefaction, LLC*, DOE/FE Order No. 2961 at 28 (May 20, 2011); *Dominion Cove Point LNG, LP,* DOE/FE Order No. 3331-B at 11 (Apr. 18, 2016); *Venture Global Calcasieu Pass, LLC,* DOE/FE Order No. 4346 at 19; *Venture Global Plaquemines LNG, LLC,* DOE/FE Order No. 4446 at 18-19 (Oct. 16, 2019); *Sierra Club, et al*., Order Denying Petition for Rulemaking on Exports of Liquefied Natural Gas, at 10 (July 18, 2023); *Venture Global CP2 LNG, LLC,* DOE/FECM Order No. 5264-A at 24 (Oct. 21, 2025).

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

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

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

[25] *Id.* at 6,684.

> and at prices responsive to market demands largely meets the public interest test….[26]

In authorizing long-term non-FTA exports for CP2 LNG (as well as in numerous other export authorizations), DOE has explained that it "continues to subscribe to the principle set forth in the 1984 Policy Guidelines that, under most circumstances, the market is the most efficient means of allocating natural gas supplies."[27] Thus, DOE has promoted the competitive, free-trade policies embodied in the 1984 Policy Guidelines by consistently authorizing LNG exports to non-FTA nations.[28] DOE should continue to follow its longstanding practice with this Application.

Most importantly here, DOE engaged in a robust and thorough analysis of the public interest in LNG exports by CP2 LNG from the Export Terminal when authorizing long-term exports to non-FTA countries in Order No. 5264-A. When authorizing short-term exports of both domestically produced gas and re-exports for other LNG terminals that have previously received long-term export authorization, DOE has often concluded that no additional public interest review beyond that conducted in the earlier non-FTA export proceeding is warranted.[29] The conclusions that no further analysis was needed were

---

[26] *Id.* at 6,685 and 6,687. The parenthetical references to exports are added in the above quotation to reflect the applicability of the Policy Guidelines to exports. *See* n.24, *supra*.

[27] *Venture Global CP2 LNG, LLC*, DOE/FECM Order No. 5264-A at 58 (Oct. 21, 2025). *See also, e.g., Freeport LNG Expansion, L.P.,* Order No. 3282 at 112 (May 17, 2013); *Lake Charles Exports*, Order No. 3324 at 125 (Aug. *7,* 2013); *Dominion Cove Point LNG, LP,* Order No. 3331 at 141 (Sept. 11, 2013); *Freeport LNG,* Order No. 3357 at 154 (Nov. 15, 2013); *Cameron LNG, LLC,* DOE/FE Order No. 3391 at 132 (Feb. 11, 2014); *Cheniere Marketing, LLC,* Order No. 3638 at 205 (May 12, 2015); *Pieridae Energy (USA), LTD.,* Order No. 3768 at 216 (Feb. 5, 2016); *Venture Global Calcasieu Pass, LLC,* DOE/FE Order No. 4346 at 69; *Venture Global Plaquemines LNG, LLC*, DOE/FE Order No. 4446 at 42.

[28] A list of all the non-FTA approvals with docket numbers, volumes, and links to the relevant DOE orders is available at: https://www.energy.gov/hgeo/articles/summary-lng-export-applications-lower-48-states.

[29] *E.g., Cove Point LNG, LP*, DOE/HGEO Order No. 5436 (June 25, 2026); *Sabine Pass Liquefaction, LLC*, DOE/HGEO Order No. 5432 (June 5, 2026); *Carib Energy (USA) LLC*, DOE/HGEO Order No. 5406 (Apr. 6, 2026); *Golden Pass LNG Terminal, LLC*, DOE/FECM Order No. 5340 (Sept. 22, 2025); *Venture Global Plaquemines LNG, LLC*, DOE/FECM Order No. 5143 (July 11, 2024); *Southern LNG Co., LLC*, DOE/FE Order No. 4687 (March 30, 2021); *Cove Point LNG, LP*, DOE/FE Order No. 4508 (Feb. 28, 2020); *Sabine Pass Liquefaction, LLC*, Order No. 4150 at 9 (Jan. 30, 2018); *Sabine Pass, LLC*, Order No. 3767 (Jan. 13, 2016); *Cameron LNG, LLC*, DOE/FE Order No. 3904 at 8-9 (Oct. 3, 2016). This practice, with respect to domestically produced LNG, informed DOE/FE's 2021 Policy Statement to incorporate short-term export authority into long-term authorizations. *See Including Short-Term Export Authority in Long-Term Authorizations for the Export of Natural Gas on a Non-Additive Basis*, 86 Fed. Reg. 2,243 (Jan. 12, 2021), available at: https://www.govinfo.gov/content/pkg/FR-2021-01-12/pdf/2020-28599.pdf.

based, at least in part, on the limiting requirement that the volumes authorized under the blanket authorization for export to non-FTA nations will not exceed the volumes already authorized in the long-term authorizations. Accordingly, as explained above, CP2 LNG proposes that this same volume limitation again apply to the new blanket authorization requested in this Application.

Furthermore, the incremental volumes that CP2 LNG now requests authorization to export – 6.0 Bcf of previously imported LNG – are *de minimis* compared to the level of its existing long-term export authorization for domestically produced LNG, and certainly in comparison to the size of U.S. natural gas markets. In its Small-Scale Rule, DOE has established a process to expedite the approval process where no facility construction is proposed for "small-scale" natural gas exports, defined as no more than 51.75 Bcf of natural gas per year, holding by rule that such exports are consistent with the public interest and authorizing such small-scale exports without any need for individualized administrative procedures.

When granting the similar re-export application of CP2 LNG's affiliate, Venture Global Plaquemines LNG, LLC ("Plaquemines LNG"), in an essentially identical scenario, DOE applied this rule, holding as an initial matter that the applicable regulation—10 C.F.R. § 590.102(p)—does not include any limitation regarding the source of small-scale exports of natural gas.[30] Rather, the application must meet only two criteria in order to qualify as an application for authorization of "small-scale exports" under the regulation: first, the requested export authorization must be below 51.75 Bcf of natural gas per year; and second, DOE's approval of the application must not require the preparation of an EIS or an EA under NEPA.[31] DOE/FECM found that Plaquemines LNG's request for authorization to export up to 6 Bcf over the course of two years met the volume limitation, and DOE/FECM issued a categorical exclusion from the requirement to prepare an EIS or EA; therefore, DOE/FECM deemed Plaquemines LNG's proposed exports to be consistent with the public interest pursuant to 10 C.F.R. § 590.208.[32]

---

30 *Venture Global Plaquemines LNG, LLC*, DOE/FECM Order No. 5143 at 7 (July 11, 2024).

31 *See id*. at 7-8 (applying the criteria in 10 C.F.R. § 590.102(p) to Plaquemines LNG's request for authorization to export up to approximately 6 Bcf of natural gas over the course of two years).

32 DOE/FECM Order No. 5143 at 7-8 (July 11, 2024).

Here, CP2 LNG's requested export authorization of 6.0 Bcf over the course of two years is well below the 51.75 Bcf per year export volume limitation. And as discussed in greater detail below, DOE will not need to prepare an EA or an EIS to act on this Application. Thus, consistent with the approval granted to Plaquemines LNG,[33] DOE should deem CP2 LNG's proposed small-scale exports of previously imported LNG from foreign sources to be consistent with the public interest under NGA Section 3(a) pursuant to 10 C.F.R. § 590.208.

Regardless of the Small-Scale Rule, DOE has repeatedly explained that its blanket authorizations to re-export previously imported LNG "were based, in part, on authoritative data indicating that United States consumers have access to substantial quantities of natural gas sufficient to meet domestic demand from other competitively-priced sources."[34] To address that issue, DOE typically takes administrative notice of the then-most-recent projections by the U.S. Energy Information Administration ("EIA") in its Annual Energy Outlook. In its most recent decisions authorizing re-exports, DOE/HGEO focused on the *Annual Energy Outlook 2026* ("AEO 2026"), in which EIA projected annual domestic dry natural gas production in 2026 and 2027 of 39.48 trillion cubic feet ("Tcf") and 38.36 Tcf, respectively, with total natural gas consumption projected to be 33.24 Tcf and 31.73 Tcf in each of 2026 and 2027.[35] Based on that data and authorizing the re-export of previously imported LNG by another terminal, DOE/HGEO concluded:

> Because domestic natural gas production levels are projected to reach an amount that well exceeds the amount of natural gas proposed for short-term export in [the Applicant's], we find that United States consumers will continue to have access to substantial quantities of natural gas sufficient to meet domestic demand from multiple other sources at

---

[33] *Venture Global Plaquemines LNG, LLC*, DOE/FECM Order No. 5143 at 7 (July 11, 2024).

[34] *See, e.g.*, *Cove Point LNG, LP*, DOE/HGEO Order No. 5436 at 8 (June 25, 2026); *Sabine Pass Liquefaction, LLC*, DOE/HGEO Order No. 5432 at 8-9 (June 5, 2026); *Golden Pass LNG Terminal LLC*, DOE/FECM Order No. 5340 at 10 (Sept. 22, 2025); *Southern LNG Co., LLC*, DOE/FECM Order No. 4982 at 8-9 (Mar. 15, 2023); *Cove Point LNG, LP,* DOE/FECM Order No. 4849 at 10 (July 8, 2022).

[35] *Cove Point LNG, LP*, DOE/HGEO Order No. 5436 at 8 & nn. 43 & 44 (June 25, 2026); *Sabine Pass Liquefaction, LLC*, DOE/HGEO Order No. 5432 at 9 & nn. 48 & 49 (June 5, 2026). In the referenced footnotes, DOE/HGEO cited the AEO 2026, available at https://www.eia.gov/outlooks/aeo/pdf/AEO_Narrative.pdf, as well as AEO 2026 Counterfactual Baseline Case, Table 13: Natural Gas Supply, Disposition, and Prices, available at https://www.eia.gov/outlooks/aeo/data/browser/#/?id=13-AEO2026&cases=cb2026&sourcekey=0.

> competitive prices without drawing on the previously imported LNG that [the Applicant] seeks to export.[36]

The cited EIA projections support the same conclusion here.

As noted above, DOE/HGEO should deem CP2 LNG's proposed small-scale exports to be consistent with the public interest pursuant to 10 C.F.R. § 590.208, consistent with the approval granted to CP2 LNG's affiliate, Plaquemines LNG, in a nearly identical scenario. Were DOE to consider other factors bearing on the public interest here, however, those factors also strongly support authorization of the proposed exports in this Application. Moreover, the current Presidential Administration, and DOE as part of it, has strongly supported LNG exports, recognizing that they advance the public interest.[37] Importantly, the DOE has recently reaffirmed, after the conclusion of a major study and its consideration of public comments on it, its long-standing conclusion that "exports of LNG from the United States are in the best interest of the American public."[38] As DOE leadership recognized in announcing that conclusion: "The facts are clear: expanding America's LNG exports is good for Americans and good for the world…LNG supports our economy, strengthens our allies, and enhances national security."[39] Accordingly, the DOE in the current Administration has advanced the "unleashing" of U.S. LNG exports

---

[36] DOE/HGEO Order No. 5436 at 8 (June 25, 2026); DOE/HGEO Order No. 5432 at 8 (June 5, 2026).

[37] Executive Orders issued on the first day of the Administration recognized the benefits of LNG exports. The Energy Emergency Executive Order recognized that "the United States has the potential to use its unrealized energy resources domestically, and to sell to international allies and partners a reliable, diversified, and affordable supply of energy. This would create jobs and economic prosperity for Americans forgotten in the present economy, improve the United States' trade balance, help our country compete with hostile foreign powers, strengthen relations with allies and partners, and support international peace and security." Exec. Order No. 14156, 90 Fed. Reg. 8,433 (Jan. 20, 2025). That same day, the Unleashing Energy Executive Order directed the DOE to "restart reviews of applications for approvals of liquified natural gas export projects as expeditiously as possible, consistent with applicable law." Exec. Order No. 14154, 90 Fed. Reg. 8353, 8357 (Jan. 20, 2025). That Executive Order also directs that "[i]n assessing the 'Public Interest' to be advanced by any particular application" to export LNG under NGA Section 3(a), DOE "shall consider the economic and employment impacts to the United States and the impact to the security of allies and partners that would result from granting the application." *Id.*

[38] *See* DOE Press Release, "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 (announcing DOE's "Response to Comments for the 2024 LNG Export Study: Energy, Economic, and Environmental Assessment of U.S. LNG Exports"), *available at* https://energy.gov/sites/default/files/2025-10/ENERGY%2C%20ECONOMIC%2C%20AND%20ENVIRONMENTAL%20ASSESSMENT%20OF%20U.S.%20LNG%20EXPORTS_RESPONSE%20TO%20COMMENTS_0.pdf.

[39] *Id*.

in numerous orders.[40] Indeed, DOE has emphasized the benefits of LNG exports when authorizing long-term exports by CP2 LNG itself.[41]

For all of these reasons, especially the qualification of the proposed exports here as small-scale exports and the thorough public interest analysis that DOE has already conducted regarding LNG exports from the CP2 LNG Terminal to non-FTA countries, the blanket authorization for re-exports requested here should be granted as consistent with the public interest.

VI. ENVIRONMENTAL IMPACT

The requested blanket authorization and the related LNG exports will not require the construction of any new or additional facilities, nor any modification of CP2 LNG's facilities previously authorized by FERC. No NEPA review would be required for that reason. In addition, DOE has determined that categorical exclusion B5.7, Export of natural gas and associated transportation by marine vessel, applies to its LNG export authorizations.[42] CP2 LNG's authorization requested here falls within this categorical exclusion and no further environmental analysis is required.

Therefore, the proposal does not constitute a major federal action significantly affecting the quality of the human environment, within the meaning of NEPA (42 U.S.C. §§ 4321, *et seq*.) and no EA or EIS is required.

---

[40] A list of all the long-term non-FTA approvals with docket numbers, volumes, and links to the relevant DOE orders is available at: https://www.energy.gov/hgeo/articles/summary-lng-export-applications-lower-48-states.

[41] *See* DOE Press Release, "Secretary Wright Signs Export Authorization for Venture Global CP2 LNG," Mar. 19, 2025, https://www.energy.gov/articles/secretary-wright-signs-export-authorization-venture-global-cp2-lng (announcing DOE's decision to conditionally grant CP2 LNG authorization to export LNG to non-FTA countries); *see* DOE Press Release, "Energy Department Approves Final Export Authorization for Venture Global CP2 LNG," Oct. 22, 2025, https://www.energy.gov/articles/energy-department-approves-final-export-authorization-venture-global-cp2-lng (announcing final export authorization allowing CP2 LNG to export LNG to non-FTA countries). DOE's Assistant Secretary of the Office of Fossil Energy, Kyle Haustveit noted "Finalizing the non-FTA authorization for CP2 LNG will enable secure and reliable American energy access for our allies and trading partners, while also providing well-paid jobs and economic opportunities at home." *Id*.

[42] *See* 10 C.F.R. Part 1021, Subpt. D, App. B, Categorical Exclusion B5.7.

VII. APPENDICES

The following appendices are attached to this Application:

Appendix A: Verification

Appendix B: Opinion of Counsel

VIII. CONCLUSION

Based on the reasons set forth above, CP2 LNG respectfully requests that the DOE/HGEO grant by no later than January 15, 2027 CP2 LNG short-term, blanket authorization to re-export LNG previously imported from foreign sources of up to the equivalent of 6.0 Bcf of natural gas from its under-construction Export Terminal on the east side of the Calcasieu Ship Channel, and the nearby Monkey Island, in Cameron Parish, Louisiana, to any country with the capacity to import LNG via ocean-going carrier and with which trade is not prohibited by U.S. law or policy, whether or not the country has an FTA with the United States requiring national treatment for trade in natural gas. CP2 LNG requests that the authorization cover a term of two years commencing on the date of issuance of the new authorization.

Respectfully submitted,

/s/ J. Patrick Nevins

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

Ammaar Joya
Latham & Watkins LLP
811 Main Street
Suite 3700
Houston, TX, 77002
(713) 546-7436
ammaar.joya@lw.com

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

Counsel for
Venture Global CP2 LNG, LLC

Dated: November 5, 2026

Appendix A

Verification

STATE OF VIRGINIA)
) SS:
CITY OF ARLINGTON)

Keith Larson, being first duly sworn on his oath deposes and says: that he is the General Counsel of Venture Global LNG, Inc., and an authorized representative of Venture Global CP2 LNG, LLC; that he is duly authorized to make this Verification; that he has read the foregoing submittal and is familiar with the contents thereof; that all the statements and matters contained therein are true and correct to the best of his information, knowledge, and belief; and that he is authorized to execute and file the same with the U.S. Department of Energy.

Keith Larson
General Counsel

Sworn to and subscribed before me this 4th day of November, 2026.

Notary Public
In and For said City
Arlington, Virginia

MICHAEL ELIEZER MILLAN
Notary Public
Commonwealth of Virginia
Registration No. 7979927
My Commission Expires Aug 31, 2030

Appendix B

OPINION OF COUNSEL

Opinion of Counsel

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

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

Respectfully submitted,



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

Dated: November 4, 2026