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December 28, 2020

Via Electronic Filing by E-Mail: fergas@hq.doe.gov

Ms. Amy Sweeney, Director
Office of Regulation, Analysis
and Engagement
Office of Fossil Energy, FE-34
U.S. Department of Energy
1000 Independence Avenue, S.W.
Washington, D.C. 20585

**Re: Nopetro LNG, LLC, FE Docket No. 20- 167 -LNG
Application for Long-Term and Short-Term, Multi-Contract
Authorizations to Export Liquefied Natural Gas to
Free Trade Agreement and Non-Free Trade Agreement Nations**

Dear Ms. Sweeney:

Pursuant to Section 3 of the Natural Gas Act (“NGA”), 15 U.S.C. § 717b, and Part 590 of the Department of Energy’s regulations, 10 C.F.R. Pt. 590, Nopetro LNG, LLC submits its Application for Long-Term and Short-Term, Multi-Contract Authorizations to Export Liquefied Natural Gas to Free Trade Agreement and Non-Free Trade Agreement Nations. Attached to the Application are the following three Appendices: Appendix A, Verification; Appendix B, Opinion of Counsel, and Appendix C, List of Liquefaction Facilities and Ports. Also attached is a Pay.gov payment confirmation for \$50.00 to cover the filing fee, which was paid today.

Ms. Amy Sweeney, Director
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Please feel free to contact me if you have any questions or need any additional information.

Respectfully submitted,



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Counsel for Nopetro LNG, LLC

**UNITED STATES OF AMERICA
DEPARTMENT OF ENERGY
OFFICE OF FOSSIL ENERGY**

Nopetro LNG, LLC

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FE Docket No. 20- 167 -LNG

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

Pursuant to Section 3 of the Natural Gas Act (“NGA”), 15 U.S.C. § 717b, and Part 590 of the Department of Energy’s (“DOE”) regulations, 10 C.F.R. Pt. 590, Nopetro LNG, LLC (“Nopetro”) submits this application (“Application”) requesting that the DOE Office of Fossil Energy (“DOE/FE”) grant consolidated long-term and short-term multi-contract authorizations for Nopetro to engage in exports on a cumulative basis of up to 51.75 billion cubic feet (“Bcf”) per year of domestically produced liquefied natural gas (“LNG”) to (1) 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 (“FTA Nations”)¹ and (2) any country with which the United States does not have a free trade agreement requiring national treatment for trade in natural gas with which trade is not prohibited by United States law or policy (“Non-FTA Nations”).

Nopetro requests that its long-term authorization commence on the date of first commercial export and end on December 31, 2050, consistent with DOE/FE’s recent policy statement

¹ The United States currently has FTAs requiring national treatment for trade in natural gas with Australia, Bahrain, Canada, Chile, Colombia, Dominican Republic, El Salvador, Guatemala, Honduras, Jordan, Mexico, Morocco, Nicaragua, Oman, Panama, Peru, Republic of Korea, and Singapore. *See, e.g., Port Arthur LNG Phase II, LLC*, DOE/FE Order No. 4562 at 8, FE Docket No. 20-23-LNG (July 14, 2020) (“*Port Arthur*”); *Commonwealth LNG, LLC*, DOE/FE Order No. 4521 at 5, FE Docket No. 19-134-LNG (Apr. 17, 2020) (“*Commonwealth*”). Nopetro asks that its authorization also include authority to export LNG to any other nation with which, in the future, the United States enters into an FTA requiring national treatment for trade in natural gas, consistent with DOE/FE’s usual practice. *See, e.g., Port Arthur* at 12; *Commonwealth* at 9.

extending natural gas export authorization for Non-FTA Nations through December 31, 2050,² and that its long-term authorization include authority to export the same approved volume for transactions of less than two years on a non-additive basis, consistent with DOE/FE’s recent policy statement determining to consolidate short-term and long-term authority in a single authorization to streamline its regulatory process and reduce administrative burdens.³

Nopetro plans to (i) source LNG primarily from small-scale liquefaction and peak shaving facilities located in the Southeastern United States, (ii) transport the LNG in approved International Organization for Standardization (“ISO”) containers⁴ from the liquefaction facilities to ports on the U.S. Gulf Coast, (iii) load the ISO containers onto ocean-going container vessels, and (iv) export the LNG to emerging markets, including in the Caribbean, Central America, and South America. The source of the proposed exports will be the vast natural gas supply produced throughout the United States and delivered to the listed facilities through the integrated natural gas pipeline grid.

While Nopetro has not yet executed contracts to purchase or export LNG, Nopetro is in the process of negotiating purchase agreements with several existing inland liquefaction facilities interested in supplying LNG to Nopetro for exportation. In Appendix C hereto, Nopetro provides

² *Extending Natural Gas Export Authorizations to Non-Free Trade Agreement Countries Through the Year 2050*, 85 Fed. Reg. 52,237 (Aug. 25, 2020) (“Term Extension Policy Statement”). As DOE/FE observed in the Term Extension Policy Statement, “[t]he principal conclusion of the 2018 LNG Export Study is that the United States will experience net economic benefits from the export of domestically produced LNG through the 30-year study period, i.e., from 2020 through 2050.” *Id.* at 52,240.

³ *Including Short-Term Export Authority in Long-Term Authorizations for the Export of Natural Gas on a Non-Additive Basis*, available at https://www.energy.gov/sites/prod/files/2020/12/f82/ST%20Exports%20Policy%20Statement_0.pdf (signed and released Dec. 18, 2020).

⁴ Nopetro intends to utilize ISO containers that have been specified as ASME tanks and have been approved by the Department of Transportation for transporting LNG.

a list of facilities that are interested in supplying LNG to Nopetro and others which may be used (including existing facilities and facilities that are under development), a brief description of these facilities, and a list of ports from which the LNG may be exported.⁵ Nopetro is also having discussions with additional LNG facilities capable of supplying LNG to Nopetro for export. To the extent Nopetro seeks to purchase LNG from facilities or to export LNG from ports that are not included in Appendix C, Nopetro will notify DOE/FE of such facilities/ports. As explained above, Nopetro initially intends to transport the LNG in approved ISO containers from the liquefaction facilities to ports on the Gulf Coast of the United States, where the ISO containers will then be loaded onto ocean-going container vessels for delivery to emerging markets. Nopetro may also purchase LNG sourced from coastal facilities and load the LNG directly onto shipping vessels. In addition, Nopetro may contract with third-party sellers and distributors to purchase LNG for export. Nopetro requests export authority on behalf of itself and as agent for other title holders of LNG.

Nopetro commits that it will comply with all requirements imposed by DOE/FE on Nopetro as an exporter and agent, including that Nopetro will:

- a. Register each LNG title holder for whom Nopetro seeks to export as agent, with such registration including a written statement by the LNG title holder acknowledging and agreeing to comply with all applicable requirements imposed by DOE/FE in Nopetro's export authorization and to incorporate those requirements in any subsequent purchase or sale agreement entered into by that title holder; and

⁵ DOE/FE recently approved an application listing potential sources of LNG supply without executed contracts, subject to subsequent submission of executed agreements. *See SpotX Energy, LLC*, DOE/FE Order No. 4461, FE Docket No. 19-104-LNG (Nov. 8, 2019) (long-term authorization); *SpotX Energy, LLC*, DOE/FE Order No. 4462, FE Docket No. 19-105-LNG (Nov. 8, 2019) (short-term authorization) ("*SpotX Orders*").

- b. File under seal with DOE/FE any relevant long-term commercial agreements once they have been executed, consistent with DOE/FE's established policy.⁶

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

I. DESCRIPTION OF THE APPLICANT

The exact legal name of the applicant is Nopetro LNG, LLC. It is a limited liability company organized under the laws of the State of Florida, with its principal place of business at 14 N.E. 1st Ave., Suite 1209, Miami, Florida 33132. Nopetro is a wholly-owned subsidiary of Nopetro-CH4 Holdings, LLC ("Nopetro-CH4 Holdings"), which is also a limited liability company organized under the laws of the State of Florida. Nopetro-CH4 Holdings is owned by CH4 Venture, LLC (38.1759%), Nopetro, LLC (36.8241%) and TLW CNG, LLC (25%), all limited liability companies organized under the laws of the State of Florida. CH4 Venture, LLC is jointly/majority owned by two individuals, Jay Demetree and Hawley Smith. Nopetro, LLC is jointly/majority owned by two individuals, Jorge Herrera and Jonathan "Jack" Locke. TLW CNG, LLC is owned by an individual, Tom Ward. All of the individual owners of the Nopetro entities are U.S. citizens.

⁶ DOE/FE has found that the commitment to file contracts once executed complies with the requirement of 10 C.F.R. § 590.202(b) to provide transaction-specific information "to the extent practicable." *See, e.g., Sabine Pass Liquefaction, LLC*, DOE/FE Order No. 2961 at 41, FE Docket No. 10-111-LNG (May 20, 2011); *Cheniere Marketing, LLC*, DOE/FE Order No. 4519 at 8-9, FE Docket No. 19-124-LNG (Apr. 14, 2020); *Commonwealth* at 7.

II. COMMUNICATIONS

All communications and correspondence regarding this Application should be addressed to:

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Counsel for Nopetro LNG, LLC

III. UNDER THE NGA, NOPETRO’S EXPORT OF LNG TO FTA NATIONS IS CONSISTENT WITH THE PUBLIC INTEREST

Under NGA Section 3(c), “the exportation of natural gas to a nation with which there is in effect a free trade agreement requiring national treatment for trade in natural gas, shall be deemed to be consistent with the public interest, and applications for such importation or exportation shall be granted without modification or delay.”⁷

As directed by NGA Section 3(c), Nopetro’s request to export LNG to FTA Nations “shall be deemed to be consistent with the public interest,” and DOE/FE should grant such authorization without modification or delay. This is consistent with DOE/FE practice of promptly granting authorizations for export to FTA nations pursuant to the statutory mandate.⁸

IV. UNDER THE SMALL-SCALE EXPORT RULE, NOPETRO’S EXPORT OF UP TO 51.75 BCF/YEAR OF LNG TO NON-FTA NATIONS IS CONSISTENT WITH THE PUBLIC INTEREST

NGA Section 3(a) requires that parties seeking to export natural gas to Non-FTA nations submit an application to the Secretary of Energy, who “shall issue” an order approving the

⁷ 15 U.S.C. § 717b(c) (2018).

⁸ See, e.g., *SpotX Energy, LLC*, DOE/FE Order No. 4461, FE Docket No. 19-104-LNG (Nov. 8, 2019) (two and a half months).

application “unless ... the proposed exportation ... will not be consistent with the public interest.”⁹ Section 3(a) of the NGA “creates a rebuttable presumption that proposed exports of natural gas are in the public interest.”¹⁰ Therefore, DOE/FE “must grant such an application unless opponents of the application overcome that presumption by making an affirmative showing of inconsistency with the public interest.”¹¹

Small-scale natural gas exports are deemed to be consistent with the public interest under Section 3(a) of the Natural Gas Act, 15 U.S.C. § 717b(a). *See* 10 C.F.R. § 590.208(a); 10 C.F.R. § 590.102(p);¹² U.S. Dep’t of Energy, *Small-Scale Natural Gas Exports*, Final Rule, 83 Fed Reg. 35,106 (July 25, 2018) (“Small-Scale Export Rule”). Specifically, Section 590.208(a) provides that “small-scale natural gas exports are deemed to be consistent with the public interest” under NGA Section 3(a) and that DOE/FE “will issue an export authorization upon receipt of any complete application to conduct small-scale natural gas exports.”

⁹ 15 U.S.C. § 717b(a) (2018). This authority has been delegated to the Assistant Secretary for Fossil Energy pursuant to Redelegation Order No. 00-002.04G issued on June 4, 2019.

¹⁰ *Sabine Pass Liquefaction, LLC*, Opinion and Order Denying Request for Review Under Section 3(c) of the NGA at 4, FE Docket No. 10-111-LNG (Oct. 21, 2010).

¹¹ *See, e.g., Jordan Cove Energy Project, L.P.*, DOE/FE Order No. 3413 at 6, FE Docket No. 12-32-LNG (Mar. 24, 2014); *Cameron LNG, LLC*, DOE/FE Order No. 3391 at 6, FE Docket No. 11-162-LNG (Feb. 11, 2014); *Freeport LNG Expansion, L.P.*, DOE/FE Order No. 3357 at 8, FE Docket No. 11-161-LNG (Nov. 15, 2013).

¹² Section 590.102(p) defines a small-scale natural gas export as “an export of natural gas to nations with which there is not in effect a free trade agreement with the United States requiring national treatment for trade in natural gas and with which trade is not prohibited by U.S. law or policy, provided that the application for such export authority satisfies the following two criteria: (1) The application proposes to export natural gas in a volume up to and including 51.75 billion cubic feet per year, and (2) DOE’s approval of the application does not require an environmental impact statement or an environmental assessment under the National Environmental Policy Act, 42 U.S.C. 4321 et seq.”

In determining that small-scale exports up to and including 51.75 Bcf/yr are consistent with the public interest under NGA Section 3(a),¹³ DOE explained the extensive information that it considered to reach that conclusion:

DOE ... considered its obligations under NGA section 3(a), the public comments received on the proposed rule, and a wide range of information bearing on the public interest, including (but not limited to) information on economic impacts, international impacts, security of domestic natural gas supply, and environmental impacts associated with these exports.

Additionally, DOE has considered the 29 final non-FTA export authorizations issued to date, as well as authoritative projections for natural gas supply, demand, and prices set forth in the U.S. Energy Information Administration's (EIA) Annual Energy Outlook 2017 ... and Annual Energy Outlook 2018 (AEO 2018). With respect to the regulatory criteria established by this rulemaking, DOE considered industry sources in establishing the volume limitation, as well as its obligations under NEPA in establishing the NEPA criterion.

In sum, DOE has thoroughly analyzed the many factors affecting the export of U.S. natural gas, as well as the unique characteristics and minimal adverse impacts of the emerging small-scale natural gas market. On this basis (and as discussed in the proposed rule), DOE has determined that the final rule is in accordance with section 3 of the NGA.¹⁴

DOE/FE recognized that there are emerging markets for small-scale natural gas exports in many countries that previously have not been targeted by larger scale LNG projects due to practical and economic constraints. DOE/FE noted that these markets include, but are not limited to,

¹³ See Small-Scale Export Rule, 83 Fed. Reg. at 35,108 (“In issuing this final rule, DOE has determined that small-scale natural gas exports are consistent with the public interest under NGA section 3(a).”).

¹⁴ *Id.* (internal citations and quotations omitted).

countries in the Caribbean, Central America and South America that can be served by a variety of transportation modes, such as approved ISO containers.¹⁵

Relying on EIA’s 2017 and 2018 AEOs, DOE/FE found that there are ample natural gas resources to meet the demand for natural gas in the United States and to export the volume of gas associated with small-scale export authorizations.¹⁶ DOE/FE therefore concluded that small-scale exports will not adversely affect the availability of natural gas supplies to domestic consumers. It explained: “The implication of the latest EIA projections in AEO 2017 and AEO 2018 is that a significantly greater quantity of natural gas is projected to be available at a lower cost than was estimated seven years ago.”¹⁷ DOE/FE also concluded that “small-scale natural gas exports are expected to generate positive economic benefits in the United States through direct and indirect job creation, increased economic activity, tax revenues, and improved U.S. balance of trade.”¹⁸ DOE/FE found small-scale exports from the U.S. will provide benefits to countries in emerging markets because “these countries will have access to a more reliable, cost-effective supply of energy that also has emissions benefits over current energy sources.”¹⁹ Finally, DOE/FE concluded that small-scale natural gas exports “will fulfill an important need for natural gas in importing countries that often lack the customer demand, waterway infrastructure, and

¹⁵ *Id.* at 35,114.

¹⁶ *Id.* at 35,109-110. In fact, natural gas production continued to grow in 2019. See U.S. EIA, *U.S. natural gas production grew again in 2019, increasing by 10%*, available at <https://www.eia.gov/todayinenergy/detail.php?id=43115#:~:text=U.S.%20natural%20gas%20gross%20withdrawals,%2C%20respectively%2C%20in%20November%202019> (Mar. 10, 2020) (“U.S. natural gas production grew by 9.8 billion cubic feet per day (Bcf/d) in 2019, a 10% increase from 2018.”).

¹⁷ Small Scale Export Rule, 83 Fed. Reg. at 35,109.

¹⁸ *Id.* at 35,112.

¹⁹ *Id.* at 35,112-13.

transmission infrastructure necessary to handle large quantities of natural gas and large LNG carriers.”²⁰

Nopetro plans to sell to small-scale emerging LNG markets identified by DOE/FE in the Small-Scale Export Rule, including countries in the Caribbean, Central America, and South America. As recognized by DOE/FE, these emerging markets have unmet demand for natural gas. Nopetro can help to meet that demand with exports of LNG pursuant to the requested authorizations. Nopetro intends to target end-users as well as power generators in these markets that currently are dependent on diesel, heavy fuel oil or propane as their fuel source. To the extent Nopetro is able to provide LNG to such users, the environments in these countries (and the world) will benefit from the substitution of high SO_x and NO_x emission fuels with cleaner burning natural gas fuel. And as DOE/FE recognized in the Small-Scale Export Rule, given that these emerging markets often lack the demand and infrastructure to accommodate large quantities of natural gas, large LNG carriers, and LNG gasification facilities, small-scale natural gas exports will allow these economic and environmental benefits to be realized.

To qualify for authorization under Section 590.208(a), the applicant must submit a complete application for authority to export no more than 51.75 Bcf/yr, and approval of the application must not require an environmental impact statement or environmental assessment under the National Environmental Policy Act, 42 U.S.C. § 4321, *et seq.* (“NEPA”).²¹ This application satisfies both conditions. As noted above, Nopetro’s request is for authorization to export up to 51.75 Bcf/yr. In addition, this Application does not embrace the construction of any new facilities; thus, a categorical exclusion from the requirement that DOE/FE must perform a

²⁰ *Id.* at 35,113.

²¹ 10 C.F.R. §§ 590.102(p); 590.208(a).

NEPA review applies.²² Nopetro therefore satisfies the two criteria and is eligible for a small-scale natural gas export authorization to Non-FTA nations.

V. NOPETRO'S REQUEST FOR EXPORT AUTHORITY IS CONSISTENT WITH RECENT APPROVALS GRANTED BY DOE/FE

The authority sought by Nopetro herein is consistent with recent authorizations granted by DOE/FE. For example, in the SpotX Orders, DOE/FE approved long-term and short-term authorizations for LNG exports to FTA and Non-FTA Nations from ports listed in the SpotX application using supply sourced from facilities listed in the application.²³ Like Nopetro, SpotX had not yet concluded commercial agreements for the purchase or sale of the LNG.²⁴ DOE/FE concluded that the requested authorizations were in the public interest pursuant to NGA Section 3(c), DOE/FE's regulations at 10 C.F.R. § 590.208(a), and the Small-Scale Export Rule.²⁵

Consistent with its standard practice, DOE/FE imposed various conditions in the SpotX Orders that Nopetro agrees to accept. Among others, DOE/FE required that where SpotX exports LNG as agent for other entities holding title to the LNG, SpotX must register those entities with DOE/FE and provide certain prescribed information.²⁶ DOE/FE also required SpotX to file or cause to be filed any long-term commercial agreements associated with the supply of natural gas

²² See 10 C.F.R. § 1021, Subpt. D, App. B5.7 (providing a categorical exclusion to "Approvals or disapprovals of new authorizations or amendments of existing authorizations to import or 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.").

²³ DOE/FE Order No. 4461 at 9; DOE/FE Order No. 4462 at 8-9.

²⁴ See DOE/FE Order No. 4461 at 5.

²⁵ DOE/FE Order No. 4461 at 9; DOE/FE Order No. 4462 at 8-9.

²⁶ DOE/FE Order No. 4461 at 12-13; see also *Freeport LNG Expansion, L.P.*, DOE/FE Order No. 2913 (Feb. 10, 2011) (approving proposal to register each LNG title holder for which applicant sought to export LNG as agent).

to the facilities and the purchase and export of LNG by SpotX, including agreements under which SpotX would export LNG as an agent for other entities. DOE/FE gave SpotX the option of filing unredacted long-term contracts or filing long-term contracts under seal, along with a public copy of each contract with commercially sensitive information redacted, or a summary of the major provisions of the contract.²⁷ Nopetro will comply with these same conditions.

VI. LIST OF APPENDICES

The below Appendices are attached hereto consistent with Section 590.202 of DOE/FE's regulations:

Appendix A Verification

Appendix B Opinion of Counsel

Appendix C List of Liquefaction Facilities and Ports

VII. CONCLUSION

For the reasons set forth in this Application, Nopetro respectfully requests that DOE/FE grant the authorizations requested herein as consistent with the public interest.

Respectfully submitted,



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Counsel for Nopetro LNG, LLC

DATED: December 28, 2020

²⁷ DOE/FE Order No. 4461 at 10.

APPENDIX A

**UNITED STATES OF AMERICA
DEPARTMENT OF ENERGY
OFFICE OF FOSSIL ENERGY**

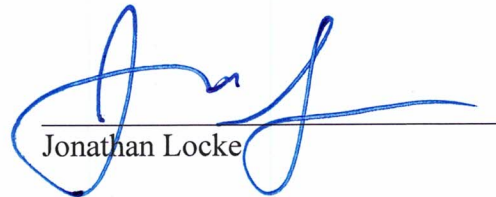
Nopetro LNG, LLC

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FE Docket No. 20- -LNG

VERIFICATION

The undersigned attests that he is the President and Chief Operating Officer of Nopetro LNG, LLC, that he is authorized to make this verification, that he has read the foregoing application, and that the statements and matters contained therein are true and correct to the best of his information, knowledge and belief.


Jonathan Locke

APPENDIX B

OPINION OF COUNSEL

|| HARPER MEYER ||

Attorneys at Law

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Direct Dial :305-577-8992

December 28, 2020

Ms. Amy Sweeney
Office of Fossil Energy (FE-34)
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585

**Re: Nopetro LNG, LLC, FE Docket No. 20-___-LNG, Application for
Long-Term and Short-Term Multi-Contract Authorizations
to Export Liquefied Natural Gas to FTA and Non-FTA Nations**

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 Nopetro LNG, LLC for Long-Term and Short-Term Multi-Contract Authorizations to Export Liquefied Natural Gas to Free Trade Agreement and Non-Free Trade Agreement Nations.

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

Very truly yours,



Ronald Albert, Jr.
Counsel to Nopetro LNG, LLC

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APPENDIX C

UNITED STATES OF AMERICA DEPARTMENT OF ENERGY OFFICE OF FOSSIL ENERGY

Nopetro LNG, LLC

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FE Docket No. 20- -LNG

LIQUEFACTION FACILITIES AND PORTS

Below is a list of the facilities from which Nopetro is seeking authority to source LNG for export at this time and the ports from which such exports will be made. Nopetro will notify DOE/FE of any additional facilities from which it will source LNG for export or any additional ports from which exports will be made prior to making such exports.

The following facilities have been licensed by, or are pending before, the Federal Energy Regulatory Commission (“FERC”). A description of the facilities may be found on the FERC e-Library website at the docket number provided:

1. Hackberry, Louisiana: 2.1 Bcfd (Sempra – Cameron LNG) (CP13-25) (Port: Cameron, LA). The company commenced commercial operations for Train No. 1 in August 2019, Trains No. 2 and No. 3 in March and August 2020, respectively.
2. Freeport, Texas: 2.14 Bcfd (Freeport LNG Dev/Freeport LNG Expansion/FLNG Liquefaction) (CP12-509) (CP15-518) (Port: Freeport, TX).
3. Corpus Christi, Texas: 1.4 Bcfd (Cheniere – Corpus Christi LNG) (CP12-507) (Port: Corpus Christi, TX).
4. Sabine Pass, Louisiana: 1.5 Bcfd (Sabine Pass Liquefaction) (CP13-552) (Port: Sabine Pass facility port, LA).
5. Elba Island, Georgia: 0.35 Bcfd (Southern LNG Company) (CP14-103) (Port: Elba Island, GA).
6. Sabine Pass, Texas: 2.1 Bcfd (ExxonMobil – Golden Pass) (CP14-517) (Port: Sabine Pass, TX).
7. Freeport, Texas: 0.72 Bcfd (Freeport LNG Dev) (CP17-470) (Port: Freeport, TX). Freeport LNG is developing a fourth natural gas liquefaction unit that will add to the three trains already in commercial operation. This expansion will allow for the export of an additional 5+ mtpa of LNG, increasing Freeport LNG’s total export capability to more than 20 mtpa of LNG per year.

The following facilities have not been licensed by FERC. A description of these facilities based on publicly available information is provided.

1. Coosada LNG facility, Spire Energy, Alabama 80 MMCF Total Capacity, LNG Source: Liquefaction (Port: Mobile, AL, Pensacola, FL, Panama City, FL, Port St. Joe, FL, Tampa, FL, Miami, FL, Port Everglades, FL, Jacksonville, FL).
2. Pinson LNG facility, Spire Energy, Alabama 120 MMCF Total Capacity, LNG Source: Liquefaction (Port: Mobile, AL, Pensacola, FL, Panama City, FL, Port St. Joe, FL).
3. East Lauderdale LNG Facility, Spire Energy, Alabama 2.988 MMCF Total Capacity, LNG Source: Truck (Port: Mobile, AL, Pensacola, FL, Panama City, FL, Port St. Joe, FL).
4. Double Springs LNG Facility, Spire Energy, Alabama .768 MMCF Total Capacity, LNG Source: Truck (Port: Mobile, AL, Pensacola, FL, Panama City, FL, Port St. Joe, FL).
5. Cherokee LNG Facility, Atlanta Gas Light Co. 624 MMCF Total Capacity, LNG Source: Liquefaction (Port: Panama City, FL, Port St. Joe, FL, Jacksonville, FL).
6. Macon LNG Facility, Atlanta Gas Light Co. 150 MMCF Total Capacity, LNG Source: Liquefaction (Port: Panama City, FL, Port St. Joe, FL, Jacksonville, FL).
7. Riverdale LNG, Atlanta Gas Light Co. 400 MMCF Total Capacity, LNG Source: Liquefaction (Port: Panama City, FL, Port St. Joe, FL, Jacksonville, FL).
8. Eagle LNG Partners, Maxville, Florida (Port: Talleyrand Marine Terminal on St. Johns River, FL, Panama City, FL, Pensacola, FL, Port St. Joe, FL) Eagle LNG has built a natural gas liquefaction plant near Jacksonville, FL, which offers a capacity of 200,000 gallons per day (87,000 gallons per day initially). The Maxville Facility is located west of downtown Jacksonville and features a 1,000,000-gallon storage tank and an LNG truck loading system. The facility is also designed to load LNG ISO containers for transport to nearby island markets. To support fueling ships, Eagle is building a fuel depot dockside at the Talleyrand Marine Terminal on the St. Johns River.
9. Stabilis Energy, George West, Texas (Port: Houston, TX, Corpus Christi, TX) The George West LNG facility is a small-volume LNG production facility located in the Eagle Ford shale production area in George West, Texas. The facility is owned and operated by Flint Hills Resources and has a liquefaction capacity of 120,000 gallons per day and a 40,000 gallon LNG Fuel Depot in Odessa providing customers with access to LNG 24 hours a day. The facility features two truck loading racks that can load two transport trailers simultaneously in less than an hour.
10. Clean Energy Pickens Plant, Willis, Texas (Port: Houston, TX, Galveston, TX) The Clean Energy LNG facility in Willis, Texas known as the Pickens Plant is a small-volume LNG production owned and operated by Clean Energy Fuels Corporation. The facility has a liquefaction capacity of 100,000 gallons per day and a storage capacity of 1 million gallons. The facility is capable of loading twelve (12) trucks per day.

11. NuBlu, Port Allen Plant, Louisiana (Port: Port Allen, Mississippi River, LA, New Orleans, LA, Panama City, FL, Pensacola, FL, Port St. Joe, FL) The Port Allen Plant is a small-volume LNG production facility owned and operated by NuBlu along the Mississippi River in Louisiana utilizing high and low-pressure natural gas pipelines. The 30,000 gallons per day facility, expandable to 90,000 gallons per day, is equipped with scales, loadout and 100,000 gallons of permanent storage.
12. JAX LNG, Jacksonville, Florida (Port: Jacksonville, FL, Panama City, FL, Pensacola, FL, Port St. Joe, FL) JAX LNG, a liquefied natural gas facility located at Dames Point in Jacksonville, Florida, is owned by subsidiaries of Southern Company Gas and North Star Midstream, LLC. It is the first small scale LNG facility in the United States with both marine and truck-loading capabilities. The JAX LNG facility has the capacity to produce 120,000 gallons of LNG per day and store more than 2 million gallons of LNG. There is room at the site to expand the facility and add two liquefaction trains and a second storage tank which would increase LNG production capacity to 600,000 gallons per day and store up to 4 million gallons.
13. Pivotal LNG, Trussville, AL (Port: Mobile, AL, Pensacola, FL, Panama City, FL, Port St. Joe, FL). Pivotal LNG, a wholly-owned subsidiary of Berkshire Hathaway Energy Gas Transmission and Storage, owns and operates the Trussville LNG plant located in Trussville, Alabama. The plant, placed in service in 1978, is the first LNG plant dedicated solely to the merchant market. The plant currently has storage of 4.8 million gallons and produces approximately 60,000 gallon per day. The facility has room for additional production and storage upgrades as the market requires in the future. Trussville has two scales and three loading racks to allow multiple transfers and truck loading operations simultaneously.

The following plants have been permitted but are not yet operational.

1. Gulf LNG Energy, Southern Gulf LNG Company LLC, 1,500 MMCF Total Capacity, LNG Source: Liquefaction (Port: Pascagoula, MS, Pensacola, FL, Panama City, FL, Port St. Joe, FL).
2. Eagle LNG Partners, Jacksonville, Florida (CP17-41) (Port: Jacksonville, FL, Port St. Joe, FL, Panama City, FL, Pensacola, FL). The proposed facility will receive natural gas transported by a local utility through existing and expanded pipelines located adjacent to the Jacksonville project site. The project will have a processing capacity of 1.5 million gallons of LNG per day, with on-site LNG storage of 12 million gallons. Eagle LNG submitted a formal filing for the project to FERC during Q1 2017. The construction was scheduled to begin in 1H 2020 and the start-up and commissioning for service date are preliminarily scheduled for 2022.
3. Cameron Parish, Louisiana: 1.41 Bcfd (Venture Global Calcasieu Pass) (CP15-550) (Port: Cameron, LA).
4. Lake Charles, Louisiana: 1.08 Bcfd (Magnolia LNG) (CP14-347) (Port: Lake Charles, LA). New York-based Glenfarne Group has won an extension on its Magnolia LNG project that gives it until April 2026 to put the new asset into service. Magnolia is a project to build a new liquefied natural gas export terminal on the Louisiana coast. The project's original owner, LNG Ltd., got a permit from the FERC to build the Magnolia project by April 2021.
5. Port Arthur, Texas: 1.86 Bcfd (Port Arthur LNG) (CP17-20) (Port: Port Arthur, LA). The Port Arthur liquefaction project, as proposed in the FERC application, includes two natural gas liquefaction trains capable of producing, under optimal conditions, up to approximately 13.5 million metric tons per annum (mtpa), up to three LNG storage tanks and ancillary support facilities to liquefy and load LNG onto ships.
6. Lake Charles, Louisiana: 2.2 Bcfd (Southern Union – Lake Charles LNG) (CP14-120) (Port: Lake Charles, LA). Energy Transfer LP is proposing a large-scale LNG export facility in Lake Charles, Louisiana. Energy Transfer announced it would take over the development of the Lake Charles LNG export project on March 30, 2020, following Shell's announcement that it has decided not to proceed with an equity investment in the project. Energy Transfer will evaluate various alternatives to advance the project, including the possibility of bringing in one or more equity partners and reducing the size of the project from three trains (16.45 mtpa of LNG capacity) to two trains (11.0 mtpa).
7. Calcasieu Parish, Louisiana: 4.0 Bcfd (Driftwood LNG) (CP17-117) (Port: Calcasieu Parish, LA, Cameron, LA). Driftwood LNG LLC, owned by Tellurian Inc., is developing a liquefied natural gas (LNG) production and export terminal on the west bank of the Calcasieu River, south of Lake Charles, Louisiana. Once complete, the terminal will be able to export up to 27.6 million tonnes of LNG per year.