

June 21, 2023

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Ms. Amy Sweeney  
U.S. Department of Energy  
Natural Gas Regulation  
FE-34, Room 3E-056  
1000 Independence Avenue, S.W.  
Washington, DC 20585

**Re: CNG HOLDING 1 LLC, FE Docket No. 22-13-CNG  
CNG HOLDING 1 Supplement to February 11, 2022 Application for Authorization to  
Export Gas to FTA Nations**

Dear Ms. Sweeney:

On February 11, 2022, CNG HOLDING 1 LLC (“CNG Holding”) submitted an application to the U.S. Department of Energy, Office of Fossil Energy and Carbon Management (DOE) for authorization to export compressed natural gas (“CNG”) to countries with which the United States has a free trade agreement (“FTA”) (“Application”). CNG Holding hereby supplements its application with the following information to assist DOE in its processing of the Application.

In light of the Natural Gas Act’s mandate that exports “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 ... shall be granted without modification or delay,”<sup>1</sup> CNG Holding respectfully requests the Department immediately issue the FTA authorization for the proposed FTA exports.

### **Foreign Ownership**

The Application states that “CNG Holding is a special purpose entity owned by Nearshore Natural Gas, LLC (“Nearshore”),<sup>2</sup> HBG Investment, LLC,<sup>3</sup> and Capital Ventures Worldwide, S.A.

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<sup>1</sup> 15 U.S.C. § 717b(c) (2022).

<sup>2</sup> Nearshore is a limited liability company organized under the laws of Delaware that engages in the development of natural gas compression technology.

<sup>3</sup> HBG Investment, LLC, is a limited liability company organized under the laws of Delaware that engages in investments in technology and infrastructure development.

“CVW”).”<sup>4</sup> As detailed in the Application, Pedro Santos is the only person holding an ownership interest in CNG Holding of 10% or more, owning 43% of CNG Holding. Mr. Santos is a lawful permanent resident of the United States, holding a green card, and is married to a U.S. citizen.

**Site Control**

As detailed in the Application, CNG Holding entered into a Joint Development Agreement (the “JDA”) with Louisiana 23 Development Company (“LA23 DevCo”), whereby (i) LA23 DevCo, as the fee title owner of a portion of the Container Port, provides CNG Holding with site control and exclusivity to develop the CNG compression and container loading facility (“Facility”) within the Container Port, (ii) LA23 DevCo and CNG Holding outline their respective investment and development roles, (iii) LA23 DevCo commits to various project timeline milestones, commitments and deliverables that will enable CNG Holding’s construction of the Facility, and (iv) LA23 DevCo and CNG Holding commit to negotiate diligently and in good faith the ground lease for the Facility site. Pursuant to and in accordance with the JDA, the parties have spent the last several months finalizing the joint development plans and ground lease.

**Feed Gas Supply**

As stated in the Application, CNG Holding intends to interconnect with an interstate natural gas pipeline to provide the CNG facility with the necessary feed gas. While the specific supply source for the yet-to-be-chosen natural gas pipeline is not conclusively known, the pipeline will likely source its gas from the Gulf Coast region, and the selected pipeline will have multiple interconnections with other Gulf Coast pipelines. There are numerous natural gas supply opportunities in the Gulf Coast region, including shale gas plays, tight gas plays, conventional gas fields and offshore production. Given the large number of supply areas, and the interconnected nature of the natural gas pipeline grid in the Gulf Coast region, it is difficult to predict precisely where the feed gas will be obtained from.

[REDACTED]

[REDACTED]

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<sup>4</sup> CVW is a company organized under the laws of the country of Panama that engages in investments in technology and infrastructure development.

Any questions regarding the Application or this supplement, may be directed to the undersigned at (202) 778-9014 or at [david.wochner@klgates.com](mailto:david.wochner@klgates.com).

Best regards,

A handwritten signature in black ink that reads "David L. Wochner". The signature is written in a cursive style with a large, stylized "D" and "W".

David L. Wochner  
*Counsel for CNG HOLDING 1 LLC*