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October 1, 2024

#### VIA ELECTRONIC MAIL

U.S. Department of Energy (FE-34)
Office of Fossil Energy and Carbon Management
Office of Natural Gas Regulatory Activities
Attn: Natural Gas Reports
P.O. Box 44375
Washington, D.C. 20026-4375

Re: Lake Charles Exports, LLC

FE Docket No. 11-59-LNG DOE/FE Order Nos. 3324 and 3324-A Lake Charles LNG Terminal Semi-Annual Report

To: Office of Natural Gas Regulatory Activities

In accordance with the conditions of DOE/FE Order Nos. 3324 and 3324-A, issued August 7, 2013, and July 29, 2016, respectively, Lake Charles Exports, LLC submits the semi-annual report as required by ordering paragraphs M and O, respectively, describing the progress of the proposed liquefaction facility project at the Lake Charles Terminal, for the reporting period **April 1, 2024 through September 30, 2024**.

Any questions concerning this filing should be addressed to the undersigned at (713) 989-2605.

Respectfully,

On behalf of Trunkline LNG Holdings LLC, A member company of Lake Charles Exports, LLC

/s/ Blaír Líchtenwalter

Blair Lichtenwalter Senior Director, Regulatory

# Lake Charles Exports, LLC FE Docket No. 11-59-LNG DOE/FE Order Nos. 3324 and 3324-A Lake Charles LNG Terminal Semi-Annual Report October 1, 2024

#### Regulatory

Lake Charles LNG Export Company, LLC ("LCLNG"), formerly known as Trunkline LNG Export, LLC ("TLNG Export"), filed its Application with the Federal Energy Regulatory Commission ("FERC") on March 25, 2014, for the LNG terminal facilities and the docket number assigned is CP14-120-000. On September 16, 2020, LCLNG submitted its Notification of Abandonment of its NGA Section 7 Facilities/Certificate Authorizations to FERC, under CP14-120, et. al., effective August 21, 2020.

Regulatory activities since the last report are as follows:

On April 12, 2024, LCLNG submitted Monthly Status Report No. 97 to FERC under Docket No. CP14-120.

On May 15, 2024, LCLNG submitted Monthly Status Report No. 98 to FERC under Docket No. CP14-120.

On June 12, 2024, LCLNG submitted Monthly Status Report No. 99 to FERC under Docket No. CP14-120.

On July 12, 2024, LCLNG submitted Monthly Status Report No. 100 to FERC under Docket No. CP14-120.

On August 8, 2024, LCLNG submitted Monthly Status Report No. 101 to FERC under Docket No. CP14-120.

On August 21, 2024, LCLNG submitted Variance Request 03 to FERC under Docket No. CP14-120, for approval of a design variance to modify the gas turbine supplier and model. On September 16, 2024, FERC issued an Informal Data Request, and LCLNG filed its Response to the Informal Data Request on September 17, 2024.

On September 17, 2024, LCLNG submitted Monthly Status Report No. 102 to FERC under Docket No. CP14-120.

Pursuant to Environmental Condition No. 9, Appendix B of the FERC Order issued December 17, 2015, for the Liquefaction Project, LCLNG continues to file the required Monthly Status Reports under Docket No. CP14-120-000.

#### **Engineering**

In 2017, LCLNG completed a front end engineering and design ("FEED") study. In April 2019, LCLNG engaged various companies to conduct a FEED verification as well as submit bids for the engineering, procurement, and construction ("EPC") related to the Project. In April 2020, LCLNG received bids for the EPC contract related to the Project. These EPC bids were evaluated; however, due to the onset of the COVID pandemic, the EPC contract was not finalized with any of the bidding parties.

LCLNG has since reengaged EPC contractors to conduct additional engineering work in connection with identified design enhancement opportunities as well as to prepare an updated EPC contract bid. The updated EPC contractor bids were received in May 2023.

In September 2024, LCLNG entered in an engineering, procurement and construction (EPC) contract with a joint venture between Technip Energies and KBR with respect to the Lake Charles LNG export project, including the fabrication, procurement, transportation, installation, commissioning and startup of the proposed three 5.5 MTPA modular design LNG trains and brownfield modifications to the existing LNG storage tanks and marine berths. The structure of the contract provides alignment between LCLNG and the EPC contractor to achieve a high quality, cost-effective project. The commencement of EPC activities under the contract is subject to LCLNG's determination to issue a notice to proceed under the contract which in turn will be subject to LCLNG making a

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final investment decision to proceed with the project based on obtaining sufficient commercial offtake commitments and third-party equity to satisfy parent company Energy Transfer LP's ("ET") internal objectives.

October 1, 2024

#### **Environmental**

On October 11, 2023, LCLNG received the renewed Section 7 (Louisiana) clearance from the U.S. Fish and Wildlife Service ("USFWS"), which remains in effect for duration of USACE extension.

On October 17, 2023, LCLNG received a determination from the National Marine Fisheries Service ("NMFS") PRD that no new consultation was required.

On January 4, 2024, LCLNG received a renewed state-species clearance from the Louisiana Department of Wildlife and Fisheries ("LDWF").

On June 13, 2024, LCLNG submitted a Request for new Exemption/NDSI to the Louisiana Department of Energy and Natural Resources ("LDENR") – Office of Coastal Management, and the approval is pending.

#### **Status of Long-Term Contracts Associated with the Facility**

LCLNG owns, leases, or has option agreements in place for the purchase/lease of all property necessary for the Liquefaction Project. Definitive agreements to implement the Liquefaction Project, and pipeline transportation services to supply natural gas to the Liquefaction Project, remain under development.

On March 29, 2022, LCLNG's parent company ET, and ENN Natural Gas ("ENN NG") and ENN Energy Holdings Limited ("ENN Energy") announced that ENN NG and ENN Energy have entered into two (2) 20-year LNG Sale and Purchase Agreements. On April 25, 2022, Energy Transfer LNG Export, LLC ("Energy Transfer LNG") filed copies of these agreement with DOE/FE under seal, and a public summary of the major provisions of these agreements. The Press Release is available from the website link below:

• https://www.businesswire.com/news/home/20220328005955/en/

On May 2, 2022, LCLNG's parent company ET and Gunvor Group Ltd announced that Gunvor Singapore Pte Ltd ("Gunvor") and Energy Transfer LNG have entered into a 20-year LNG Sale and Purchase Agreement. On May 19, 2022, Energy Transfer LNG filed a copy of this agreement with DOE/FE under seal, and a public summary of the major provisions of this agreement. The Press Release is available from the website link below:

https://www.businesswire.com/news/home/20220502005601/en/

On May 3, 2022, LCLNG's parent company ET, and SK Gas Trading LLC ("SK Gas") announced that Energy Transfer LNG and SK Gas have entered into an 18-year LNG Sale and Purchase Agreement. On May 19, 2022, Energy Transfer LNG filed a copy of this agreement with DOE/FE under seal, and a public summary of the major provisions of this agreement. The Press Release is available from the website link below:

https://www.businesswire.com/news/home/20220503005981/en/

On June 5, 2022, LCLNG's parent company ET and China Gas Holdings Limited ("China Gas") announced that China Gas Hongda Energy Trading Co., LTD, a subsidiary of China Gas, and Energy Transfer LNG have entered into a 25-year LNG Sale and Purchase Agreement. On June 30, 2022, Energy Transfer LNG filed a copy of this agreement with DOE/FE under seal, and a public summary of the major provisions of this agreement. The Press Release is available from the website link below:

https://www.businesswire.com/news/home/20220603005512/en/

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On August 24, 2022, LCLNG's parent company ET and Shell NA LNG LLC ("Shell") announced that Shell and Energy Transfer LNG have entered into a 20-year LNG Sale and Purchase Agreement. On September 19, 2022, Energy Transfer LNG filed a copy of this agreement with DOE/FE under seal, and a public summary of the major provisions of this agreement. The Press Release is available from the website link below:

https://www.businesswire.com/news/home/20220824005720/en/

On July 12, 2023, LCLNG's parent company ET announced that it has entered into three non-binding Heads of Agreement (HOAs) related to long-term LNG offtake from its Lake Charles LNG project for an aggregate of 3.6 MTPA. One of the HOAs specifies that a Japanese consortium would purchase 1.6 MTPA for a 20-year term, subject to an option to convert the offtake arrangement to an equity participation providing for the same volume of LNG. Under one of the HOAs, Chesapeake Energy Marketing LLC would supply to Lake Charles LNG volumes of natural gas sufficient to produce 1.0 MTPA of LNG for a period of 15 years and, post liquefaction, Gunvor Singapore Pte Ltd would purchase LNG from Chesapeake at a price indexed to the Japan Korea Marker (JKM) for a period of 15 years. The other HOA is with a U.S. customer and relates to a tolling arrangement for 1.0 MTPA for a 15-year term. The HOAs are subject to the negotiation and execution of definitive agreements.

https://energytransferlng.com/Newsroom.html

#### **Date Facility is Expected to Be Operational**

Commensurate with the construction schedule proposed by the EPC bidding parties in 2020, the 1st Train is anticipated to be operational approximately 48 months from the beginning of construction, and Trains 2 and 3 are scheduled for completion in approximately 4 month increments after the 1st Train.

On August 30, 2019, a *Request for Extension of Time* (Accession No. 20190830-5193) was submitted to the FERC, requesting an extension of deadlines to December 2025 for the completion of the construction of the LNG export terminal facilities and related pipeline facilities, all as more fully set forth in the FERC filing. On December 6, 2019 FERC issued a Letter Order granting LCLNG's August 30, 2019 *Request for Extension of Time* to December 16, 2025 (Accession No. 20191205-3025).

On March 4, 2020, Lake Charles Exports, LLC submitted its Amendment to Authorizations for Long-Term Authorization to Export Liquefied Natural Gas to Free Trade Agreement and Non-Free Trade Agreement Countries to the DOE, under Docket Nos. 11-59-LNG and 16-110-LNG.

On March 4, 2020, Lake Charles LNG Export Company, LLC submitted its Amendment to Authorizations for Long-Term Authorization to Export Liquefied Natural Gas to Free Trade Agreement and Non-Free Trade Agreement Countries to the DOE, under Docket Nos. 13-04-LNG and 16-109-LNG.

On October 6, 2020, DOE/FE issued Order Nos. 2987-A, 3324-B, and 4011-A (11-59-LNG/16-110-LNG), and Order Nos. 3252-B, 3868-A, and 4010-A (13-04-LNG/16-109-LNG), granting the Lake Charles LNG Export and LCE applications for the extension of the timelines for export to be consistent with the FERC certificate timeline of December 16, 2025.

On January 31, 2022, LCLNG filed a request with FERC for a three-year extension of time, until December 16, 2028, to complete construction of the project facilities. On May 6, 2022, FERC issued an order granting the requested extension of time. *See Lake Charles LNG Company, LLC, et al.*, 179 FERC ¶ 61,086 (2022).

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On May 24, 2022, LCLNG filed an application requesting that DOE/FE grant an extension to the currently authorized export term of each of the authorizations through December 31, 2050, consistent with the Final Policy Statement Extending Natural Gas Export Authorizations to Non-Free Trade Agreement Countries Through the Year 2050. This application is pending at DOE/FE. On June 21, 2022, Lake Charles Exports, LLC ("LCE") submitted an application requesting that DOE/FE issue an order amending the existing Non-FTA commencement of operations deadlines to December 16, 2028 to align with the FERC extension of time. On April 21, 2023, DOE/FE issued an Order Denying Application for Second Extension of Deadline to Commence Exports of Liquified Natural Gas to Non-Free Trade Agreement Countries. On May 22, 2023, LCE filed a request for Rehearing of Order Denying Application for Second Extension of Deadline to Commence Exports of Liquefied Natural Gas to Non-Free Trade Agreement Countries.

On August 18, 2023, as supplemented on August 22, 2023, LCE filed an Application with the DOE seeking long-term multi-contract authorization to export domestically produced liquefied natural gas (LNG) up to the equivalent of 851 billion cubic feet of natural gas per year to Non-Free Trade Agreement (Non-FTA) countries. LCE proposes to export LNG from its Lake Charles Terminal site located in Lake Charles, Louisiana to any country that has, or in the future will have, the capacity to import LNG via ocean-going carrier, with which the United States does not have an FTA requiring national treatment for trade in natural gas, and with which trade is not prohibited by U.S. law or policy. The authorization is requested for a term extending through December 31, 2050. LCE requests this authorization on its own behalf and as agent for other parties that hold title to the LNG at the time of export. On January 26, 2024, the White House announced a decision to pause pending approvals of liquefied natural gas exports, and the Department of Energy ("DOE") announced it will initiate a process to update economic and environmental analyses used to review LNG export applications to Non-FTA countries. LCE is unable to predict the timing or outcome of DOE's process as it relates to LCE's application. On July 1, 2024, the United States District Court for the Western District of Louisiana issued a Memorandum Ruling granting a preliminary injunction and ordering that the LNG Export Ban be stayed in its entirety, effective immediately.

LCLNG completed onsite activities for the supplementary geotechnical investigations, as previously discussed with FERC Staff, on January 30, 2023. The onsite activities included 25 geotechnical borings, 13 geophysical borings, three test pits, and 18 electrical resistivity soundings. Lab testing of samples procured during the onsite activities was completed in June 2023.

Laser scanning of the existing facility slated for reuse to support export operations was completed in May 2023.

LCLNG confirms that the Project area has not experienced any significant changes and the environmental and other public interest findings underlying the FERC's authorizations for the Project remain valid.