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

SpotX Energy, LLC

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Docket No. 19-104-LNG

Docket No. 19-105-LNG

**APPLICATION OF SPOTX ENERGY, LLC  
FOR LONG-TERM AND SHORT-TERM AUTHORIZATION  
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 regulations of the Department of Energy (“DOE”), 10 C.F.R. § 590, SpotX Energy, LLC (“SpotX”) submits this application (“Application”) to the DOE Office of Fossil Energy (“DOE/FE”) for long-term and short-term authorization to export on a cumulative basis up to 51.75 billion cubic feet (“Bcf”) per year of 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”)<sup>1</sup> 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”).

With respect to its request for authorization to export to Non-FTA Nations, SpotX relies on DOE/FE’s recently enacted Final Rule amending its regulations to facilitate the authorization of small-scale natural gas exports. (“Small-Scale Export Rule”).<sup>2</sup> SpotX requests long-term

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<sup>1</sup> 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.

<sup>2</sup> Small-Scale Natural Gas Exports, 83 Fed. Reg. 35106 (July 25, 2018) (revising 10 C.F.R. § 590.208).

authorization for a 20-year period and short-term authorization for a 2-year period commencing on the earlier of (i) the date of first export or (ii) five (5) years from the date the requested authorizations are granted.

SpotX intends to source LNG primarily from small-scale liquefaction facilities located on the United States Gulf Coast and export the LNG primarily to emerging markets in the Caribbean, Central America, Latin America and Africa. While SpotX has not executed any contracts to purchase or export LNG at the current time, SpotX has had discussions with several existing liquefaction facilities interested in supplying LNG to SpotX for exportation. A list of existing facilities that are interested in supplying LNG to SpotX and which may be utilized, a brief description of these facilities, and a list of ports from where the LNG may be exported is included in Appendix C. Additional LNG facilities capable of supplying LNG to SpotX for export are under discussion. To the extent SpotX seeks to purchase LNG from facilities that are not included on Appendix C or to export from ports not included on this appendix, SpotX will file a notification with DOE/FE to supplement the appendix. The grant of export authority to SpotX and other similar scale-scale exporters will enable these facilities to operate without the need to obtain export authorization themselves.

SpotX may also contract with third-party sellers and distributors to purchase LNG for export. The source of natural gas supply to be liquefied and exported by SpotX will be the vast natural gas supply that may be produced throughout the United States and delivered to these liquefaction facilities through the integrated natural gas pipeline grid. SpotX initially intends to transport the LNG in approved ISO containers from the liquefaction facilities to ports on the Southeastern coast of the United States where the ISO containers will be loaded onto ocean-going

container vessels for delivery to these emerging markets.<sup>3</sup> Alternatively, SpotX may purchase LNG sourced from facilities on the shoreline and load the LNG directly onto shipping vessels.

Consistent with other LNG export authorizations in recent years, SpotX requests export authority on behalf of itself and as agent for other title holders of LNG, provided that:

a) SpotX shall register each LNG title holder for whom SpotX 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 included by DOE/FE in SpotX's export authorization, and to include those requirements in any subsequent purchase or sale agreement entered into by that title holder; and

b) SpotX shall file under seal with DOE/FE any relevant long-term commercial agreements once they have been executed.

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

## **I. DESCRIPTION OF APPLICANT**

The exact legal name of the applicant is SpotX Energy, LLC. SpotX is a limited liability company organized under the laws of the State of Delaware, with its principal place of business in Houston, Texas. The sole member of Spot Energy, LLC is R2 Capital Assets, LLC, which in turn has two members: (1) the Ravi Bajaj Revocable Trust and (2) Rahul Bajaj. The Manager of SpotX Energy, LLC, and trustee of the Ravi Bajaj Revocable Trust, is Ravi Bajaj.<sup>4</sup>

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<sup>3</sup> Specifically, SpotX intends to utilize ISO containers that have been specified as ASME tanks and have been approved by the Department of Transportation for transporting LNG.

<sup>4</sup> Ravi Bajaj is a Lawful Permanent Resident of the United States and has been granted Extraordinary Ability (EB-1A) status based on his demonstrated global expertise in 'natural gas production and commercialization'. Rahul Bajaj is a naturalized U.S. Citizen. Notification to the Committee On Foreign Investment in the United States ("CFIUS") is not required because SpotX was formed as a "greenfield" Delaware LLC in the United States and is exempt from CFIUS notification (see 31 C.F.R. 800.301(a) Example 3). Furthermore, CFIUS notifications are not triggered by arms-length export transactions by U.S. corporations exporting products, as such activities do not have the potential to cause the foreign buyer of products to gain control of the U.S. exporter. (see generally 31 C.F.R. 800.301)

## II. COMMUNICATIONS

All communications and correspondence regarding this Application should be addressed

to:

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## III. SPOTX MEETS THE STANDARD FOR EXPORT AUTHORITY TO FTA NATIONS

NGA section 3(c) provides that:

[T]he 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.<sup>5</sup>

Under this statutory presumption, that portion of this Application that seeks to export LNG to FTA Nations shall be deemed to be consistent with the public interest. As required by the NGA, DOE/FE should grant such authorization without modification or delay. Indeed, DOE/FE promptly grants authorizations, as it should do here, for export to FTA nations as a matter of statutory requirement.<sup>6</sup>

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<sup>5</sup> 15 U.S.C. § 717b(c) (2006).

<sup>6</sup> See, e.g., *Alaska LNG Project LLC*, Order No. 3554; *Magnolia LNG, LLC*, DOE/FE Order No. 3406 (Mar. 5, 2014); *Annova LNG, LLC*, DOE/FE Order No. 3394 (Feb. 20, 2014); *Delfin LNG LLC*, DOE/FE Order No. 3393 (Feb. 20, 2014); *ConocoPhillips Alaska Natural Gas Corporation*, DOE/FE Order No. 3392 (Feb. 19, 2014); *Sabine Pass Liquefaction, LLC*, DOE/FE Order No. 3384 (Jan. 22, 2014); *Barca LNG LLC*, DOE/FE Order No. 3365 (Nov. 26, 2013).

#### IV. SPOTX MEETS THE STANDARD FOR EXPORT AUTHORITY TO NON-FTA NATIONS

NGA section 3(a) sets forth the general standard of review for export applications:

[N]o person shall export any 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, [the Secretary] 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 whole or in part, with such modification and upon such terms and conditions as the [Secretary] may find necessary or appropriate.<sup>7</sup>

According to DOE/FE, “[a]pplying the foregoing statutory language, DOE has consistently ruled that Section 3(a) of the NGA creates a rebuttable presumption that proposed exports of natural gas are in the public interest.”<sup>8</sup> Accordingly, 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.”<sup>9</sup>

In evaluating the “public interest” DOE/FE “has identified a range of factors that it evaluates when reviewing an application for export authorization.”<sup>10</sup> The factors include “economic impacts, international impacts, security of natural gas supply, and environmental

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<sup>7</sup> 15 U.S.C. § 717b(a) (2006) (emphasis added). This authority has been delegated to the Assistant Secretary for Fossil Energy pursuant to Redesignation Order No. 00-002.04D (Nov. 6, 2007).

<sup>8</sup> *Sabine Pass Liquefaction, LLC*, DOE/FE Docket 10-111-LNG, Opinion and Order Denying Request for Review Under Section 3(c) of the NGA (Oct. 21, 2010); *See also Panhandle Producers and Royalty Owners Assoc. v. ERA*, 822 F.2d 1105, 1111 (D.C. Cir. 1987) (“A presumption favoring import authorization, then, is completely consistent with, if not mandated by, the statutory directive.”).

<sup>9</sup> *Jordan Cove Energy System, L.P.*, DOE/FE Order No. 3413 at 6 (Mar. 24, 2014); *Cameron LNG, LLC*, DOE/FE Order No. 3391 at 6 (Feb. 11, 2014); *FLNG Liquefaction, LLC, FLNG Liquefaction 2, LLC and FLNG Liquefaction 3, LLC*, DOE/FE Order No. 3357 at 8 (Nov. 15, 2013); *Dominion Cove Point LNG, LP*, DOE/FE Order No. 3331 at 7 (Sept. 11, 2013); *Lake Charles Exports, LLC*, DOE/FE Order No. 3324 at 6-7 (Aug. 7, 2013); *Freeport LNG Expansion, L.P., Freeport LNG Expansion, L.P. and FLNG Liquefaction, LLC*, DOE/FE Order No. 3282 at 6 (May 17, 2013).

<sup>10</sup> *Freeport LNG Expansion, L.P. and FLNG Liquefaction, LLC*, DOE/FE Order No. 3282 at 6 (May 17, 2013).

impacts, among others.”<sup>11</sup> DOE/FE also applies the principles set forth in its *Policy Guidelines and Delegation Orders Relating to the Regulation of Imported Natural Gas*, which are intended to promote free and open trade by minimizing federal government interference.<sup>12</sup> Under the Policy Guidelines:

“The market, not government, should determine the price and other contract terms of imported [or exported] gas ... The federal government’s primary responsibility in authorizing imports [or exports] should be to evaluate the need for the gas and whether the import [or export] arrangement will provide the gas on a competitively priced basis for the duration of the contract while minimizing regulatory impediments to a freely operating market.”

In 2013, DOE/FE affirmed that “it continues to subscribe to the principle set forth in our 1984 Policy Guidelines that, under most circumstances, the market is the most efficient means of allocating natural gas supplies.”<sup>13</sup> While the Policy Guidelines solely address imports, DOE/FE has found that the principles are applicable equally to exports.<sup>14</sup>

As stated above, DOE/FE recently amended its regulations to facilitate small-scale natural gas exports. In its Small-Scale Export Rule, DOE/FE determined that small-scale exports up to and including 51.75 Bcf/yr are consistent with the public interest under NGA section 3(a). DOE/FE recognized that there is an emerging market for small-scale natural gas exports in many countries that have heretofore not been targeted by larger scale LNG projects due to practical and economic constraints.<sup>15</sup> DOE/FE noted that these markets include, but are not limited to, countries

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<sup>11</sup> *Id.*

<sup>12</sup> Policy Guidelines and Delegation Orders Relating to the Regulation of Imported Natural Gas, 49 Fed. Reg. 6,684 (Feb. 22, 1984) (“Policy Guidelines”).

<sup>13</sup> *Freeport LNG Expansion, L.P. and FLNG Liquefaction, LLC*, DOE/FE Order No. 3282 at 112 (May 17, 2013).

<sup>14</sup> See, e.g., *Jordan Cove Energy System, L.P.*, DOE/FE Order No. 3413 at 7 (Mar. 24, 2014) (citing Phillips Alaska Natural Gas Corp. and Marathon Oil Co., DOE/FE Order No. 1473 at 14 (Apr. 2, 1999)).

<sup>15</sup> Small-Scale Export Rule, 83 Fed. Reg. at 35107.

in the Caribbean, Central American and South America that can be served by a variety of transportation modes, such as approved ISO containers. In addition, SpotX has identified small-scale generation and mining opportunities on the Southern and West Coasts of Africa where the voyage time of LNG ISO containers makes the fuel switch to LNG economically viable.

Based on its analysis of the factors affecting the export of natural gas from the U.S., as well as the unique characteristics and minimal adverse impacts of the emerging small-scale natural gas market, DOE/FE concluded that small-scale natural gas exports shall be deemed to be consistent with the public interest. In reaching this conclusion, DOE/FE analyzed the factors commonly evaluated in determining whether natural gas exports are in the public interest. Relying on the Energy Information Administration's 2017 and 2018 Annual Energy Outlook ("AEO"), DOE/FE found that there are adequate natural gas resources to both meet the demand for natural gas in the United States and to export the volume of gas associated with small-scale export authorizations. DOE/FE, therefore, concluded that small-scale exports will not adversely affect the availability of natural gas supplies to domestic consumers.<sup>16</sup>

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 revenue, and improved U.S. balance of trade.<sup>17</sup> The DOE/FE's finding of positive economic impacts in the Small-Scale Export Rule is consistent with findings made by DOE/FE in numerous orders approving many other export applications.<sup>18</sup> Finally, DOE/FE found

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<sup>16</sup> 83 Fed. Reg. at 35109-35110.

<sup>17</sup> *Id.* at 35112.

<sup>18</sup> See, e.g., *ConocoPhillips Company*, DOE/FE Order No. 2731 at 10 (Nov. 30, 2009) (exportation of LNG will help to improve the United States' balance of payments with the destination countries.); *Cheniere Marketing, Inc.*, DOE/FE Order No. 2651 at 14 (June 8, 2009) (exports may mitigate balance of payments); *Freeport LNG Expansion, L.P., FLNG Liquefaction, LLC, FLNG Liquefaction 2, LLC and FLNG Liquefaction 3, LLC*, DOE/FE Order No. 3357 at 153 (Nov. 15, 2013) (U.S. exports can counteract concentration within global LNG markets, thereby diversifying

small-scale exports from the U.S. will provide benefits to the emerging markets by providing these countries with a more diversified, reliable and cost-effective source of energy and improve their environment by allowing them to switch from fuel sources such as diesel and/or fuel oil to cleaner burning natural gas.

SpotX intends to target some of the same small-scale emerging LNG markets identified by DOE/FE in the Small-Scale Export Rule, including countries in the Caribbean, Central America, Latin America, as well as Africa. SpotX believes that these emerging markets have unmet demand for natural gas that SpotX can meet with exports of LNG pursuant to the requested authorizations. SpotX intends to target end-users as well as power generators in these markets that currently are dependent on diesel fuel as their fuel source. Consequently, the environments in these countries will improve greatly from the substitution of high SO<sub>x</sub> and NO<sub>x</sub> emission fuels with cleaner burning natural gas fuel. 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. Furthermore, combining small-scale LNG exports with low sulfur fuel oils offer a cost-effective power generation solution to remote and off-grid customers reliant on high sulfur fuels in these regions.

To qualify for authorization under the Small-Scale Export Rule, an applicant must (1) submit a complete application for authority to export no more than 51.75 Bcf/yr and (2) approval

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international supply options and improving energy security for many of this country's allies and trading partners); *Jordan Cove Energy System, L.P.*, DOE/FE Order No. 3413 at 142 (Mar. 24, 2014) (U.S. exports can diversify global LNG supplies, and increase the volumes of LNG available globally, it will improve energy security for many U.S. allies and trading partners.).



of the application must not require an environmental impact statement (“EIS”) or environmental assessment (“EA”) under the National Environmental Policy Act, 42 U.S.C. § 4321, *et seq.* (“NEPA”). 10 C.F.R. § § 590.102(p); 590.208(a). Because SpotX will not be constructing any new facilities, SpotX’s Application is eligible for a categorical exclusion from the requirement that DOE/FE perform an EIS or EA under NEPA.<sup>19</sup> Specifically, the Application is eligible for categorical exclusion B5.7 under the DOE/FE’s regulations implementing NEPA. 10 C.F.R. § 1021, subpart D, appendix B5.7. Consequently, SpotX has satisfied the two elements of the Small-Scale Export Rule and is eligible for a small-scale natural gas export authorization.

## V. AGENCY

DOE/FE has consistently granted the type of agency authority sought here by SpotX. DOE/FE first addressed the concept of agency rights in Freeport LNG Expansion, L.P. and FLNG Liquefaction, LLC (“FLEX”). DOE/FE found that “FLEX has requested an acceptable process by which FLEX can act as agent for others who want to export LNG” and that “FLEX’s agency rights and registration procedures are an alternative to the non-binding policy adopted by DOE/FE in DOE Opinion and Order No. 2859 . . . that the title for all LNG authorized to be exported shall be held by the authorization holder at the point of export.”

DOE/FE also accepted FLEX’s proposal to file the relevant long-term commercial agreements under seal once they have been executed. DOE/FE stated that by: “accepting FLEX’s requested registration process and contract terms, DOE/FE will ensure that the title holder is aware of all requirements in the Order, including destination restrictions, that DOE will have a record of all authorized exports, and that DOE will have direct contact information and point of contact with

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<sup>19</sup> SpotX does not plan to construct LNG facilities in the future, nor will it cause any facilities to be constructed in the future. Rather, SpotX seeks authority to source gas from any facilities that may be constructed in the future only after such facilities have been constructed.

the title holder.” DOE/FE concluded that “[t]his process is responsive to current LNG markets and provides an expedited process by which companies seeking to export LNG can do so.”

DOE/FE should grant SpotX’s proposed procedure as it is identical to the procedure that DOE/FE consistently has granted.

## **VI. APPENDICES**

Attached hereto are Appendices required by 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 above, SpotX requests that DOE/FE issue an order granting it the authorizations requested. As demonstrated herein, the authorizations requested are not inconsistent with the public interest and, in fact, are deemed to DOE/FE’s regulations to be in the public interest. Accordingly, the authorizations should be granted pursuant to Section 3 of the Natural Gas Act and DOE/FE’s Small Scale Export Rule.

Respectfully submitted,

*Howard L. Nelson*

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APPENDIX A

UNITED STATES OF AMERICA  
DEPARTMENT OF ENERGY  
OFFICE OF FOSSIL ENERGY

SpotX Energy, LLC

Docket No. 19-\_\_LNG

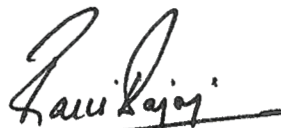
VERIFICATION

County of \_\_\_\_\_  
State of \_\_\_\_\_

REPUBLIC OF ANGOLA  
CITY OF LUANDA  
EMBASSY OF THE  
UNITED STATES OF AMERICA

} SS

The undersigned, being duly sworn, on oath states that he is the authorized representative of SpotX Energy, LLC and is duly authorized to make this Verification; that he has read the foregoing application and that all the statements and matters contained therein are true and correct to the best of his information, knowledge and belief.



Ravi Bajaj

SWORN AND SUBSCRIBED before me this 1<sup>st</sup> day of August, 2019.



Notary Public  
**Paul Giblin**  
Vice Consul  
U.S. Embassy - Luanda

**APPENDIX B**

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

SpotX Energy, LLC

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Docket No. 19-104-LNG  
Docket No. 19-105-LNG

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**OPINION OF COUNSEL**

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August 12, 2019

Mr. John Anderson  
Office of Fossil Energy (FE-34)  
U.S. Department of Energy  
1000 Independence Avenue, SW  
Washington, DC 20585

**Re: *Spot X Energy, LLC*, Docket Nos. 19-104-LNG and 19-105-LNG Application for Long-Term and Short-Term Authorization to Export Liquefied Natural Gas to Both FTA and Non-FTA Countries.**

Dear Mr. Anderson:

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 SpotX Energy, LLC (“SpotX”) for Long-Term and Short-Term Authorization to Export Liquefied Natural Gas to Free Trade Agreement and Non-Free Trade Agreement Nations.

I am counsel to Spot X, a limited liability company organized under the laws of the State of Delaware. I have reviewed and relied upon the formation documents of SpotX, and it is my opinion that the proposed exports described in the Application are within the limited liability company powers of SpotX.

Very truly yours,



Howard L. Nelson  
*Counsel to Spot X Energy, LLC*

## APPENDIX C

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

SpotX Energy, LLC

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Docket No. 19-104-LNG  
Docket No. 19-105-LNG

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### LIQUEFACTION FACILITIES AND PORTS

The following is a list of the facilities from which SpotX is seeking authority to source LNG for export at this time and the ports from which these exports will be made. SpotX will notify DOE/FE of additional facilities it will export from prior to exporting LNG from such additional facilities:

The following facilities have been licensed by, or 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, Louisiana)
2. **Freeport, Texas:** 2.14 Bcfd (Freeport LNG Dev/Freeport LNG Expansion/FLNG Liquefaction) (CP12-509) (CP15-518) (Port: Freeport, Texas)
3. **Corpus Christi, Texas:** 1.4 Bcfd (Cheniere – Corpus Christi LNG) (CP12-507) (Port: Corpus Christi, Texas)
4. **Sabine Pass, Louisiana:** 0.7 Bcfd Train 6 (Sabine Pass Liquefaction) (CP13-552) (Port: Sabine Pass facility port, Louisiana)
5. **Elba Island, Georgia:** 0.35 Bcfd (Southern LNG Company) (CP14-103) (Port: Elba Island)

6. **Cameron Parish, Louisiana:** 1.41 Bcfd (Venture Global Calcasieu Pass) (CP15-550) (Port: Cameron, Louisiana)
7. **Sabine Pass, Texas:** 2.1 Bcfd (ExxonMobil – Golden Pass) (CP14-517) (Port: Sabine Pass facility port, Louisiana)
8. **Lake Charles, Louisiana:** 2.2 Bcfd (Southern Union – Lake Charles LNG) (CP14-120) (Port: Lake Charles, Louisiana)
9. **Lake Charles, Louisiana:** 1.08 Bcfd (Magnolia LNG) (CP14-347) (Port: Lake Charles, Louisiana)
10. **Hackberry, Louisiana:** 1.41 Bcfd (Sempra - Cameron LNG) (CP15-560) (Port: Hackberry, Louisiana)
11. **Port Arthur, Texas:** 1.86 Bcfd (Port Arthur LNG) (CP17-20) (Port: Port Arthur, Louisiana)
12. **Calcasieu Parish, Louisiana:** 4.0 Bcfd (Driftwood LNG) (CP17-117) (Port: Calcasieu Parish or Cameron, Louisiana)
13. **Freeport, Texas:** 0.72 Bcfd (Freeport LNG Dev) (CP17-470) (Port: Freeport, Texas)

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

14. **Eagle LNG Partners, Maxville, Florida** (Port: Talleyrand Marine Terminal on St. Johns River)

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). This state-of-the-art facility is operational and producing high-quality LNG. The facility has production capacity available for sale to both domestic and international clients. 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.

15. **Eagle LNG Partners, Jacksonville, Florida** (Port: Jacksonville, Florida)

The project will occupy a 194-acre parcel that is zoned for industrial activity, in an area that currently hosts other bulk fuel terminals. The proposed facility will receive natural gas transported by a local utility through existing and expanded pipelines located adjacent to the Jacksonville project site. Eagle LNG will procure electric energy from Jacksonville Electric Authority. 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 is preliminarily scheduled for 2H 2019, and start-up and commissioning for service date 2021.

**16. Stabilis Energy, George West, Texas** (Port: Houston, Texas or Corpus Christi, Texas )

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.

**17. Clean Energy Pickens Plant, Willis, Texas** (Port: Houston, Texas or Galveston, Texas)

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 for loading twelve (12) trucks per day.

**18. NuBlu, Port Allen Plant, Louisiana** (Port: Port Allen, Mississippi River, Louisiana or New Orleans, Louisiana)

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. The company is currently in discussions to export LNG in ISO containers to the Caribbean, Central America and South America.

**19. Universal LNG Solutions, Yoakum, Texas** (Port: Port O'Connor or Galveston, Texas)

The Universal LNG Solution (formerly Heyco LNG) facility in Yoakum, Texas is a small-volume LNG production owned and operated by Universal LNG Holdings. The facility has a liquefaction capacity of 300,000 gallons per day with the potential to expand to more than 800,000 gallons per day. The plant supplies LNG to Universal LNG's fleet of 15 tractor-trailer trucks.

**20. JAX LNG, Jacksonville, Florida** (Port: Jacksonville)

JAX LNG, a liquefied natural gas facility located at Dames Point in Jacksonville, Florida, 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.