

UNITED STATES OF AMERICA  
DEPARTMENT OF ENERGY  
OFFICE OF FOSSIL ENERGY

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U.S. DEPARTMENT OF ENERGY )  
 ) FE DOCKET NOS. 10-85-LNG, *et al.*  
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ORDER AMENDING LONG-TERM AUTHORIZATIONS FOR THE  
EXPORT OF NATURAL GAS TO INCLUDE SHORT-TERM EXPORT  
AUTHORITY ON A NON-ADDITIVE BASIS, AND VACATING  
RELATED SHORT-TERM AUTHORITY IN SEPARATE ORDERS

DOE/FE ORDER NO. 4641

DECEMBER 18, 2020

## I. INTRODUCTION

Concurrently with the issuance of this Order, the Department of Energy’s (DOE) Office of Fossil Energy (FE) is announcing in a policy statement (Policy Statement)<sup>1</sup> that it is discontinuing its practice of issuing separate long-term and short-term authorizations<sup>2</sup> for exports of domestically produced natural gas from the same facility (or facilities) under section 3 of the Natural Gas Act (NGA).<sup>3</sup> DOE/FE is instead establishing a practice that long-term authorizations to export domestically produced natural gas—including liquefied natural gas (LNG), compressed natural gas, and compressed gas liquid<sup>4</sup>—include additional authority to export the same approved volume pursuant to transactions with terms of less than two years on a non-additive basis (including non-additive commissioning volumes exported prior to the start of a facility’s commercial operations).<sup>5</sup> By consolidating this authority in a single authorization without any increase in total approved export volumes, this action will streamline DOE/FE’s regulatory process and reduce administrative burdens.

The Policy Statement applies only to future long-term export authorizations. In this blanket Order, DOE/FE is taking action on certain existing long-term authorizations to export natural gas consistent with the Policy Statement in three respects:

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<sup>1</sup> U.S. Dep’t of Energy, Including Short-Term Export Authority in Long-Term Authorizations for the Export of Natural Gas on a Non-Additive Basis; Policy Statement, \_\_ Fed. Reg. \_\_ (forthcoming) (signed on Dec. 18, 2020). The Policy Statement also will be posted on DOE/FE’s website at: <https://www.energy.gov/fe/services/natural-gas-regulation>.

<sup>2</sup> For purposes of this Order, the terms “authorization” and “order” are used interchangeably.

<sup>3</sup> 15 U.S.C. § 717b. The authority to regulate the imports and exports of natural gas, including LNG, under NGA section 3 has been delegated to the Assistant Secretary for FE in Redelegation Order No. 00-002.04G, issued on June 4, 2019.

<sup>4</sup> In referring to natural gas in this policy statement, DOE refers primarily, but not exclusively, to LNG. Several DOE proceedings have involved other types of natural gas: compressed natural gas (or CNG) in FE Docket Nos. 13-157-CNG and 20-57-CNG, and compressed gas liquid (or CGL) in FE Docket Nos. 14-83-CGL, 16-22-CGL, and 19-147-CGL. *See* 15 U.S.C. § 717a(5) (definition of natural gas); 10 C.F.R. § 590.102(i) (same).

<sup>5</sup> This Order and the Policy Statement do not apply to long-term export authorizations involving modes of transport other than by marine vessel, including but not limited to orders authorizing exports of natural gas by pipeline.

First, DOE/FE is amending certain existing long-term authorizations to include short-term export authority (including to export commissioning volumes).<sup>6</sup> As amended by this Order, each existing long-term order will include short-term export authority on a non-additive basis to the previously approved long-term exports for each authorization holder—meaning without any increase in the total export volume for the respective facility (or facilities). This applies to long-term authorizations to export natural gas in the form of LNG, compressed natural gas, and compressed gas liquid to both: (i) any country with which the United States currently has, or in the future will have, a free trade agreement (FTA) requiring national treatment for trade in natural gas (FTA countries), under NGA section 3(c);<sup>7</sup> and (ii) any other country with which trade is not prohibited by U.S. law or policy (non-FTA countries), under NGA section 3(a).<sup>8</sup> These existing orders are identified in Appendix A of this Order (long-term FTA authorizations) and Appendix B (long-term non-FTA authorizations).<sup>9</sup>

Second, DOE/FE is vacating five existing short-term authorizations in their entirety. Because the short-term authority is being incorporated into the corresponding long-term order for each authorization holder, these existing short-term orders are no longer necessary. These five short-term orders are identified in Appendix C.

Finally, DOE/FE is partially vacating two short-term authorizations that include other export authority not at issue in this Order. The authorization holders will retain the remaining

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<sup>6</sup> *Id.*

<sup>7</sup> 15 U.S.C. § 717b(c). 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. FTAs with Israel and Costa Rica do not require national treatment for trade in natural gas.

<sup>8</sup> 15 U.S.C. § 717b(a).

<sup>9</sup> In some cases, DOE/FE granted an applicant both FTA and non-FTA authority in a consolidated order, and those entries are indicated.

authority granted under those orders. These two short-term orders are identified in Appendix D.

Additional information is set forth below.

## II. **BACKGROUND**

### A. **Statutory Background**

DOE/FE is responsible for authorizing exports of domestically produced natural gas—including LNG, compressed natural gas, and compressed gas liquid—to foreign countries under section 3 of the NGA. Under NGA section 3(c), exports of natural gas to FTA countries are “deemed to be consistent with the public interest.”<sup>10</sup> Therefore, applications authorizing exports of natural gas to FTA countries must be granted “without modification or delay.”<sup>11</sup> Section 3(a) of the NGA governs exports to non-FTA countries.<sup>12</sup> DOE, as affirmed by the U.S. Court of Appeals for the District of Columbia Circuit, has consistently interpreted NGA section 3(a) as creating a rebuttable presumption that a proposed export of natural gas is in the public interest.<sup>13</sup> Accordingly, DOE/FE will conduct an informal adjudication and grant a non-FTA application unless DOE/FE finds that the proposed exportation will not be consistent with the public interest.<sup>14</sup>

Before reaching a final decision on a non-FTA application, DOE/FE must also comply with the National Environmental Policy Act of 1969 (NEPA).<sup>15</sup> DOE/FE’s environmental

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<sup>10</sup> *Id.* at 15 U.S.C. § 717b(c).

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

<sup>12</sup> *Id.* at 15 U.S.C. § 717b(a).

<sup>13</sup> *See Sierra Club v. U.S. Dep’t of Energy*, 867 F.3d 189, 203 (D.C. Cir. 2017) (“We have construed [NGA section 3(a)] as containing a ‘general presumption favoring [export] authorization.’”) (quoting *W. Va. Pub. Serv. Comm’n v. U.S. Dep’t of Energy*, 681 F.2d 847, 856 (D.C. Cir. 1982)).

<sup>14</sup> *See id.* (“there must be ‘an affirmative showing of inconsistency with the public interest’ to deny the application” under NGA section 3(a)) (quoting *Panhandle Producers & Royalty Owners Ass’n v. Econ. Regulatory Admin.*, 822 F.2d 1105, 1111 (D.C. Cir. 1987)). Additionally, qualifying small-scale exports of natural gas to non-FTA countries are deemed to be consistent with the public interest under NGA section 3(a). *See* 10 C.F.R. § 590.102(p); 10 C.F.R. § 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).

<sup>15</sup> 42 U.S.C. § 4321 *et seq.*

review process under NEPA may result in the preparation or adoption of an environmental impact statement (EIS) or environmental assessment (EA) describing the potential environmental impacts associated with the application.<sup>16</sup> In other cases, DOE/FE may determine that an application is eligible for a categorical exclusion from the preparation or adoption of an EIS or EA, pursuant to DOE’s regulations implementing NEPA.<sup>17</sup>

## **B. Regulatory Background**

### **1. DOE Regulations Involving Contract Terms**

DOE/FE’s regulations implementing section 3 of the NGA are codified in 10 C.F.R. Part 590. In relevant part, any person applying to export natural gas from the United States or to amend an existing export authorization<sup>18</sup> is required to provide DOE with “a copy of all relevant contracts and purchase agreements”<sup>19</sup> and to identify any “contract volumes” related to the supply of natural gas to be exported.<sup>20</sup> DOE/FE’s regulations, however, do not address the terms of contracts for the supply or export of natural gas, or distinguish between types of export authorizations based on the contract term.

### **2. Long-Term Export Authority**

Because of the time, complexity, and expense of commercializing, financing, and constructing LNG export terminals, authorization holders typically apply to DOE/FE for long-term authority to export LNG (or other types of natural gas) from their export facility to FTA and non-FTA countries. Since 2010, DOE/FE has issued more than 100 long-term authorizations

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<sup>16</sup> Typically, the federal agency responsible for permitting the export facility—either the Federal Energy Regulatory Commission or the U.S. Department of Transportation’s Maritime Administration—serves as the lead agency in the NEPA review process, and DOE serves as a cooperating agency. Where no other federal agency is responsible for permitting the export facility, DOE serves as the lead agency in the NEPA review process.

<sup>17</sup> See 10 C.F.R. Part 1021, Subpart D, Appendix B (listing of categorical exclusions from preparation of either an EA or EIS under NEPA).

<sup>18</sup> 10 C.F.R. § 590.201(a). For purposes of this policy statement, DOE uses the terms “authorization” and “order” interchangeably.

<sup>19</sup> *Id.* § 590.202(c).

<sup>20</sup> *Id.* § 590.202(b)(2).

approving the export of natural gas in the form of LNG, compressed natural gas, or compressed gas liquid to either FTA countries, non-FTA countries, or both under consolidated FTA and non-FTA orders. These long-term authorizations—which originally ranged in duration from 20 to 30 years (depending on the type of order) and which now may extend through the year 2050<sup>21</sup>—are supported by the authorization holders’ natural gas supply and sales contracts that often have similarly lengthy terms. In the long-term orders issued to date, DOE/FE specifies that the authorization holder is authorized to export the natural gas “pursuant to one or more long-term contracts (a contract greater than two years).”<sup>22</sup>

### **3. Short-Term Export Authority**

In 2015, DOE/FE received the first application requesting short-term (or “blanket”) authorization to export domestically produced LNG over a two-year period to both FTA and non-FTA countries under NGA section 3.<sup>23</sup> In the application, filed by Sabine Pass Liquefaction, LLC (Sabine Pass), Sabine Pass noted that it held (at that time) two long-term FTA orders and one long-term non-FTA order authorizing it to export domestically produced LNG from the Sabine Pass Liquefaction Project, then under construction in Cameron Parish, Louisiana.<sup>24</sup> Sabine Pass requested to export a subset of its total export volume approved under its long-term authorizations for the two-year period. Sabine Pass explained that, in anticipation

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<sup>21</sup> Effective August 25, 2020, DOE/FE discontinued its practice of granting a standard 20-year export term for long-term authorizations to export domestically produced natural gas from the lower-48 states to non-FTA countries. DOE/FE adopted a term through December 31, 2050, as the standard export term for long-term non-FTA authorizations, unless a shorter term is requested by the applicant. *See* U.S. Dep’t of Energy, Extending Natural Gas Export Authorizations to Non-Free Trade Agreement Countries Through the Year 2050, Notice of Final Policy Statement and Response to Comments, 85 Fed. Reg. 52,237 (Aug. 25, 2020) [hereinafter Term Extension Policy Statement].

<sup>22</sup> *See, e.g., Epsilon LNG LLC*, DOE/FE Order No. 4629, FE Docket No. 20-31-LNG, Opinion and Order Granting Long-Term Authorization to Export Natural Gas to Mexico for Liquefaction, and to Re-Export U.S.-Sourced Natural Gas in the Form of Liquefied Natural Gas from Mexico to Free Trade Agreement and Non-Free Trade Agreement Nations, at 55 (Dec. 8, 2020) (Ordering Para. A).

<sup>23</sup> Sabine Pass Liquefaction, LLC, FE Docket No. 15-171-LNG, Application for Blanket Authorization to Export Liquefied Natural Gas (Nov. 6, 2015).

<sup>24</sup> *Id.* at 2-3.

of the start of liquefaction operations at the Liquefaction Project, it sought “to engage in short-term exports of LNG produced both prior to commercial operations as well as subsequent to commercial operations if and when appropriate market opportunities arise.”<sup>25</sup> Sabine Pass further stated that the requested short-term authorization would provide it with “enhanced operational flexibility and the ability to export produced LNG cargoes that may be rejected by customers under one or more long-term contracts.”<sup>26</sup>

In January 2016, in Order No. 3767, DOE/FE granted Sabine Pass’s application to export LNG by vessel “on a short-term or spot market basis” from the Sabine Pass Liquefaction Project.<sup>27</sup> In evaluating the non-FTA portion of the application, DOE stated that it already had “conducted a full public interest review under NGA section 3(a)” for Sabine Pass’s long-term non-FTA authorization.<sup>28</sup> Next, DOE/FE noted that Sabine Pass was seeking only to export a non-additive portion of its total export volume over the two-year period. DOE/FE found:

Provided that the volumes proposed for export ... when added to any volumes exported under Sabine Pass’ long-term export authorization, do not exceed [the approved long-term export volume] on an annual (*i.e.*, consecutive 12 month) basis, the public interest impacts of the total exports will not increase as a consequence of our approval of the Application in this proceeding.<sup>29</sup>

On this basis, DOE/FE concluded that “no additional public interest review beyond that conducted in the earlier non-FTA export proceedings is warranted.”<sup>30</sup>

In the ordering paragraphs for Sabine Pass’s short-term order, DOE/FE specified that Sabine Pass was authorized to export the requested LNG “pursuant to transactions that have

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<sup>25</sup> *Id.* at 4.

<sup>26</sup> *Id.* at 6.

<sup>27</sup> *Sabine Pass Liquefaction, LLC*, DOE/FE Order No. 3767, FE Docket No. 15-171-LNG, Order Granting Blanket Authorization to Export Liquefied Natural Gas by Vessel from the Sabine Pass LNG Terminal Located in Cameron Parish, Louisiana, at 2 (Jan. 13, 2016).

<sup>28</sup> *Id.* at 9.

<sup>29</sup> *Id.* at 9-10 (emphasis added).

<sup>30</sup> *Id.* at 10.

terms of no longer than two years.”<sup>31</sup> DOE/FE also required that “[t]he volume of LNG authorized for export to non-FTA countries in this Order, when combined with the volume of LNG approved for export in [Sabine Pass’s long-term non-FTA order] shall not exceed [the total approved non-FTA volume] during any consecutive 12-month period.”<sup>32</sup>

Under this framework, DOE/FE has issued 13 additional short-term authorizations to supplement one or more existing long-term authorizations for the same facility (or facilities) and authorization holder. To maintain this export authority, authorization holders are required to apply for new short-term orders—and DOE is required to process and review those applications—every two years.<sup>33</sup> Five of these short-term orders are currently active, including Sabine Pass’s most recent short-term order issued in January 2020.<sup>34</sup> As indicated, each of these orders approves the requested short-term exports on a non-additive basis to the previously approved long-term exports for each authorization holder—meaning without any increase in the total export volume for the respective facility (or facilities).

Additionally, in every short-term order issued for non-FTA exports under NGA section 3(a), DOE/FE has evaluated its obligations under NEPA. In each order, DOE/FE determined that the approval of the application “will not result in any incremental environmental impacts as compared to the environmental impacts previously reviewed” for the corresponding long-term authorization(s).<sup>35</sup> DOE/FE also found that approval of each application would not require

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<sup>31</sup> *Id.* at 13 (Ordering Para. A).

<sup>32</sup> *Id.* at 13-14 (Ordering Para. B).

<sup>33</sup> See U.S. Dep’t of Energy, Office of Fossil Energy, “How to Obtain Authorization to Import and/or Export Natural Gas and LNG - Types of Authorizations and Requests,” available at: <https://www.energy.gov/fe/services/natural-gas-regulation/how-obtain-authorization-import-andor-export-natural-gas-and-lng>.

<sup>34</sup> *Sabine Pass Liquefaction, LLC*, DOE/FE Order No. 4487, FE Docket No. 19-133-LNG, Order Granting Blanket Authorization to Export Liquefied Natural Gas to Free Trade Agreement and Non-Free Trade Agreement Nations, at 14-15 (Jan. 15, 2020) (Ordering Paras. A, B).

<sup>35</sup> See, e.g., *id.* at 12.



additional construction or modification to the previously approved facilities.<sup>36</sup> Accordingly, in every short-term order for non-FTA exports to date, DOE/FE has granted the non-FTA portion of the application, in part, based on a categorical exclusion from the preparation of an EA or EIS under NEPA<sup>37</sup> (specifically, categorical exclusion B5.7 under DOE’s regulations at 10 C.F.R. Part 1021, Subpart D, Appendix B).<sup>38</sup>

### **III. DISCUSSION**

#### **A. Action Consistent with Policy Statement Under NGA Section 3**

Nearly five years ago, in January 2016, DOE/FE issued its first short-term LNG export authorization to Sabine Pass to supplement its existing long-term LNG export authorizations.<sup>39</sup> Since that time, the U.S. market for natural gas—and, in particular, the LNG export market—has matured, as has DOE’s understanding of the administrative burdens associated with implementing its regulatory program under NGA section 3. Upon review, DOE has determined that it is no longer necessary to issue separate long-term and short-term authorizations to export natural gas from the same facility (or facilities) for the same authorization holder. If an authorization holder has a long-term export order tied to contracts of two years or longer, but wishes to export a subset of that approved volume on a short-term or spot market basis under transactions with terms of less than two years (including commissioning volumes prior to the

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<sup>36</sup> See, e.g., *id.* at 12-13.

<sup>37</sup> See, e.g., *id.* at 12-13, 14 (Findings Para. (3)).

<sup>38</sup> 10 C.F.R. Part 1021, Subpt. D, App. B, Categorical Exclusion B5.7) (providing a categorical exclusion where approvals or disapprovals of authorizations to import or export natural gas under NGA section 3 involve minor operational changes, but not new construction). DOE notes that, on January 4, 2021, an amended form of this B5.7 categorical exclusion will take effect. See U.S. Dep’t of Energy, National Environmental Policy Act Implementing Procedures; Final Rule, 85 Fed. Reg. 78,197 (Dec. 4, 2020) (effective date of Jan. 4, 2021).

<sup>39</sup> See *supra* note 27.

start of a facility's commercial operations<sup>40</sup>), DOE/FE finds that it is beneficial to provide both types of authority in a single consolidated order going forward.

As an initial matter, DOE/FE's regulations implementing NGA section 3 do not address the terms of an applicant's natural gas supply or sales contracts, nor do they distinguish between types of export authority on this basis.<sup>41</sup> Therefore, there is no legal requirement for DOE/FE to continue issuing separate short-term and long-term authorizations on a non-additive basis from the same facility.

DOE/FE also finds that there are no practical benefits to continuing to separate these types of authorizations. DOE/FE developed this approach in 2016 during a rapidly evolving regulatory period for exports of LNG and other forms of natural gas. At this point, however, DOE/FE's regulatory practice is well established, U.S. companies have been exporting domestically produced LNG from the lower 48-states around the globe for nearly five years,<sup>42</sup> and the need for U.S. exporters to have operational flexibility to compete in the global marketplace is greater than ever.<sup>43</sup>

Accordingly, in the Policy Statement, DOE/FE is establishing that long-term authorizations to export domestically produced natural gas—including LNG, compressed natural gas, and compressed gas liquid—will include authority to export the same approved volume pursuant to transactions with terms of less than two years on a non-additive basis (including non-

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<sup>40</sup> Cf. U.S. Dep't of Energy, Office of Fossil Energy, *LNG Monthly*, at 38 (Nov. 2020), available at: [https://www.energy.gov/sites/prod/files/2020/11/f80/LNG%20Monthly%202020\\_4.pdf](https://www.energy.gov/sites/prod/files/2020/11/f80/LNG%20Monthly%202020_4.pdf) (defining "commissioning cargoes" as "pre-commercial cargoes loaded while export facility operations are still undergoing final testing and inspection," and stating that "[c]ommissioning cargoes may occur multiple times for the same facility as individual LNG trains enter service").

<sup>41</sup> See *supra* § II.A (discussing DOE's regulations implementing NGA section 3 at 10 C.F.R. Part 590).

<sup>42</sup> Indeed, after four years exporting at market-based levels, the United States has become one of the top three LNG exporters in the world. See Term Extension Policy Statement, 85 Fed. Reg. at 52,244.

<sup>43</sup> DOE recently discussed the benefits associated with increasing operational flexibility for U.S. exporters, including but not limited to providing economic benefits and improving energy security for the United States and its allies. See *id.*

additive commissioning volumes to be exported prior to the start of a facility's commercial operations). Based on its analysis of the U.S. natural gas market, DOE/FE believes this action is in the public interest under NGA section 3 for existing long-term export authorizations, as well.<sup>44</sup> To ensure that DOE/FE's existing export authorizations reflect this change, DOE/FE is hereby amending or vacating the affected orders (*see supra* at 2-3), as set forth below.

## **B. Environmental Review Under NEPA for Amendment to Non-FTA Authorizations**

DOE/FE is amending certain existing long-term non-FTA authorizations to include authority to export the same approved volume pursuant to transactions with terms of less than two years on a non-additive basis (including non-additive commissioning volumes). DOE/FE previously conducted a NEPA analysis (or NEPA analyses) for non-FTA exports that covered all facilities associated with each export application. Additionally, DOE/FE has determined that the action taken in this Order will not require any new construction or modifications to any of facilities associated with each export application.<sup>45</sup> DOE's regulations at 10 CFR Part 1021, Subpart D, Appendix B provide a list of categorical exclusions from preparation of either an EA or EIS under NEPA. Categorical exclusion B5.7 applies to natural gas import or export approvals that do not involve new construction but may require minor operational changes to existing projects. On December 17, 2020, DOE/FE issued a blanket categorical exclusion under this provision applicable to the non-FTA authorizations identified in Appendix B.<sup>46</sup> This Order amends the non-FTA portion of those authorizations, in part, based on this categorical exclusion.

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<sup>44</sup> As noted *supra* at 1 n.5, this Order and the Policy Statement do not apply to long-term export authorizations involving modes of transport other than by marine vessel, including but not limited to orders authorizing exports of natural gas by pipeline.

<sup>45</sup> App. at 8-9.

<sup>46</sup> U.S. Dep't of Energy, Categorical Exclusion Determination, Order Amending Long-Term Authorizations for the Export of Natural Gas to Include Short-Term Export Authority on a Non-Additive Basis, FE Docket Nos. 10-85-LNG, *et al.* (Dec. 17, 2020).

## ORDER

Pursuant to section 3 of the Natural Gas Act and DOE/FE's regulations at 10 C.F.R.

§ 590.404, it is ordered that:

A. In each long-term authorization identified in Appendices A and B to this Order, Ordering Paragraph A<sup>47</sup> is amended to add the following sentence at the end of the paragraph:

As of December 18, 2020, this authorization also includes:

(i) authority to export the same approved volume pursuant to transactions of any duration—including but not limited to transactions of less than two years—on a non-additive basis; and (ii) authority to export commissioning volumes (in the same approved volume) prior to the commercial operations of the LNG export facility (or facilities) named in this authorization, on a non-additive basis.

All other obligations, rights, and responsibilities established by each order identified in Appendices A and B remain in effect.

B. The short-term authorizations identified in Appendix C to this Order are vacated in their entirety.

C. The two short-term export authorizations identified in Appendix D to this Order are vacated in part. All other obligations, rights, and responsibilities established in these two orders remain in effect—specifically, the authorization holders retain the authority granted in

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<sup>47</sup> “Ordering Paragraph A” refers to the operative Ordering Paragraph A of each order, whether in the original order or in a subsequent amendment.

those orders to export LNG previously imported from foreign sources.

Issued in Washington, D.C., on December 18, 2020.

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Steven Winberg  
Assistant Secretary  
Office of Fossil Energy

**APPENDIX A: EXISTING LONG-TERM FTA AUTHORIZATIONS**  
**(AMENDED)**

<b>ORDER NUMBER<sup>48</sup></b>	<b>DATE ISSUED</b>	<b>DOCKET NUMBER</b>	<b>AUTHORIZATION HOLDER(S)</b>
2833	9/7/2010	10-85-LNG	Sabine Pass Liquefaction, LLC
2913	2/10/2011	10-160-LNG	Freeport LNG Expansion, L.P., <i>et al.</i>
2987	7/22/2011	11-59-LNG	Lake Charles Exports, LLC
2993	7/27/2011	11-71-LNG	Carib Energy (USA) LLC
3019	10/7/2011	11-115-LNG	Cove Point LNG, LP
3041	12/7/2011	11-127-LNG	Jordan Cove Energy Project, L.P.
3059	1/17/2012	11-145-LNG	Cameron LNG, LLC
3066	2/10/2012	12-06-LNG	Freeport LNG Expansion, L.P., <i>et al.</i>
3104	6/15/2012	12-47-LNG	Gulf LNG Liquefaction Company, LLC
3105	6/15/2012	12-50-LNG	SB Power Solutions Inc.
3106	6/15/2012	12-54-LNG	Southern LNG Company, LLC
3147	9/27/2012	12-88-LNG	Golden Pass LNG Terminal LLC
3164	10/16/2012	12-99-LNG	Cheniere Marketing, LLC and Corpus Christi Liquefaction, LLC
3193	11/21/2012	12-123-LNG	CE FLNG, LLC
3245	2/26/2013	12-183-LNG	Magnolia LNG, LLC
3252	3/7/2013	13-04-LNG	Lake Charles LNG Export Company, LLC
3290	5/24/2013	13-26-LNG	MPEH, LLC
3306	7/11/2013	13-30-LNG	Sabine Pass Liquefaction, LLC

<sup>48</sup> Each order number represents the original order and any subsequent orders in the sequence, including any amendments to the original order.

3307	7/12/2013	13-42-LNG	Sabine Pass Liquefaction, LLC
3345	9/27/2013	13-69-LNG	Venture Global Calcasieu Pass, LLC
3356	11/6/2013	13-105-LNG	Argent Marine Management, Inc.
3360	11/14/2013	13-104-LNG	Advanced Energy Solutions, LLC
3364	11/26/2013	13-115-LNG	Eos LNG LLC
3365	11/26/2013	13-117-LNG	Barca LNG LLC
3384	1/22/2014	13-121-LNG	Sabine Pass Liquefaction, LLC
3393	2/20/2014	13-129-LNG	Delfin LNG LLC
3394	2/20/2014	13-140-LNG	Annova LNG Common Infrastructure, LLC
3406	3/5/2014	13-131-LNG	Magnolia LNG, LLC
3447	6/13/2014	13-157-CNG	Emera CNG, LLC
3520	10/10/2014	14-88-LNG	Venture Global Calcasieu Pass, LLC
3537	10/21/2014	14-56-LNG	Strom, Inc.
3554	11/21/2014	14-96-LNG	Alaska LNG Project LLC
3555	12/2/2014	14-83-CGL	SeaOne Gulfport, LLC
3566	12/15/2014	14-89-LNG	SCT&E LNG, LLC
3595	2/12/2015	14-92-LNG	Sabine Pass Liquefaction, LLC
3601	3/18/2015	14-209-LNG	American LNG Marketing LLC
3620	4/9/2015	14-204-LNG	Cameron LNG, LLC
3639	5/22/2015	14-179-LNG	Pieridae Energy (USA), Ltd.
3656	5/29/2015	15-19-LNG	American LNG Marketing LLC
3662	6/17/2015	15-25-LNG	Venture Global Calcasieu Pass, LLC
3680	7/10/2015	15-36-LNG	Cameron LNG, LLC

3681	7/17/2015	15-33-LNG	Bear Head LNG Corporation and Bear Head LNG (USA), LLC
3682	7/17/2015	15-44-LNG	G2 Net-Zero LNG LLC
3698	8/20/2015	15-53-LNG, 18-162-LNG	Port Arthur LNG, LLC
3716	9/24/2015	15-62-LNG	Texas LNG Brownsville LLC
3866	7/21/2016	16-28-LNG	Venture Global Plaquemines LNG, LLC
3867	7/21/2016	16-15-LNG	Eagle LNG Partners Jacksonville, LLC
3869	8/17/2016	15-190-LNG	Rio Grande LNG, LLC
3968	2/28/2017	16-144-LNG	Driftwood LNG LLC
4010	6/29/2017	16-109-LNG	Lake Charles LNG Export Company, LLC <i>Consolidated FTA/non-FTA order cross-referenced below</i>
4011	6/29/2017	16-110-LNG	Lake Charles Exports, LLC <i>Consolidated FTA/non-FTA order cross-referenced below</i>
4078	9/15/2017	17-79-LNG	Eagle LNG Partners Jacksonville II LLC <i>Consolidated FTA/non-FTA order cross-referenced below</i>
4162	3/11/2018	17-105-LNG	Fourchon LNG LLC
4200	6/13/2018	17-167-LNG	Galveston Bay LNG, LLC
4202	6/25/2018	18-27-LNG	Blue Water Fuels, LLC
4248	9/19/2018	18-70-LNG	Mexico Pacific Limited LLC
4277	11/9/2018	18-78-LNG	Corpus Christi Liquefaction Stage III, LLC
4317	1/25/2019	18-144-LNG	ECA Liquefaction, S. de R.L. de C.V.



4318	1/25/2019	18-145-LNG	Energía Costa Azul, S. de R.L. de C.V.
4461	11/8/2019	19-104-LNG	SpotX Energy, LLC <i>Consolidated FTA/non-FTA order cross-referenced below</i>
4486	1/13/2020	19-147-LNG	SeaOne Corpus Christi, LLC
4519	4/14/2020	19-124-LNG	Cheniere Marketing, LLC and Corpus Christi Liquefaction, LLC
4520	4/14/2020	19-125-LNG	Sabine Pass Liquefaction, LLC
4521	4/17/2020	19-134-LNG	Commonwealth LNG, LLC
4562	7/14/2020	20-23-LNG	Port Arthur LNG Phase II, LLC
4616	11/2/2020	20-73-CNG	Andalusian Energy, LLC
4629	12/8/2020	20-31-LNG	Epsilon LNG LLC <i>Consolidated FTA/non-FTA order cross-referenced below</i>

**APPENDIX B: EXISTING LONG-TERM NON-FTA AUTHORIZATIONS**  
**(AMENDED)**

<b>ORDER NUMBER</b>	<b>DATE ISSUED</b>	<b>DOCKET NUMBER(S)</b>	<b>AUTHORIZATION HOLDER(S)</b>
2961	5/20/2011	10-111-LNG	Sabine Pass Liquefaction, LLC
3282	5/17/2013	10-161-LNG	Freeport LNG Expansion, L.P., <i>et al.</i>
3324	8/7/2013	11-59-LNG	Lake Charles Exports, LLC
3331	9/11/2013	11-128-LNG	Cove Point LNG, LP
3357	11/15/2013	11-161-LNG	Freeport LNG Expansion, L.P., <i>et al.</i>
3391	2/11/2014	11-162-LNG	Cameron LNG, LLC
3413	3/24/2014	12-32-LNG	Jordan Cove Energy Project L.P.
3638	5/12/2015	12-97-LNG	Cheniere Marketing, LLC and Corpus Christi Liquefaction, LLC
3643	5/28/2015	14-96-LNG	Alaska LNG Project LLC
3669	6/26/2015	13-30-LNG, 13-42-LNG, 13-121-LNG	Sabine Pass Liquefaction, LLC
3690	8/7/2015	14-209-LNG	American LNG Marketing LLC
3727	10/19/2015	13-157-CNG	Emera CNG, LLC
3753	12/4/2015	14-206-LNG	Air Flow North America Corp.
3768	2/5/2016	14-179-LNG	Pieridae Energy (USA), Ltd.
3770	2/5/2016	15-33-LNG	Bear Head LNG Corporation and Bear Head LNG (USA), LLC
3792	3/11/2016	15-63-LNG	Sabine Pass Liquefaction, LLC
3797	3/18/2016	15-67-LNG	Cameron LNG, LLC
3846	7/15/2016	15-90-LNG	Cameron LNG, LLC

3868	7/29/2016	13-04-LNG	Lake Charles LNG Export Company, LLC
3909	11/30/2016	13-132-LNG	Magnolia LNG, LLC
3937	11/28/2016	16-98-LNG	Carib Energy (USA) LLC
3956	12/16/2016	12-100-LNG	Southern LNG Company, L.L.C.
3957	12/19/2016	16-108-LNG	Freeport LNG Expansion, L.P., <i>et al.</i>
3978	4/25/2017	12-156-LNG	Golden Pass LNG Terminal LLC
4010	6/29/2017	16-109-LNG	Lake Charles LNG Export Company, LLC <i>Consolidated FTA/non-FTA order cross-referenced above</i>
4011	6/29/2017	16-110-LNG	Lake Charles Exports, LLC <i>Consolidated FTA/non-FTA order cross-referenced below</i>
4028	6/1/2017	13-147-LNG	Delfin LNG LLC
4078	9/15/2017	17-79-LNG	Eagle LNG Partners Jacksonville II LLC <i>Consolidated FTA/non-FTA order cross-referenced below</i>
4312	12/14/2018	18-70-LNG	Mexico Pacific Limited LLC
4346	3/5/2019	13-69-LNG, 14-88-LNG, 15-25-LNG	Venture Global Calcasieu Pass, LLC
4364	3/29/2019	18-144-LNG	ECA Liquefaction, S. de R.L. de C.V.
4365	3/29/2019	18-145-LNG	Energía Costa Azul, S. de R.L. de C.V.
4372	5/2/2019	15-96-LNG	Port Arthur LNG, LLC
4373	5/2/2019	16-144-LNG	Driftwood LNG LLC
4374	5/28/2019	18-26-LNG	Freeport LNG Expansion, L.P. and

			FLNG Liquefaction 4, LLC
4410	7/31/2019	12-101-LNG	Gulf LNG Liquefaction Company, LLC
4445	10/3/2019	16-15-LNG	Eagle LNG Partners Jacksonville LLC
4446	10/16/2019	16-28-LNG	Venture Global Plaquemines LNG, LLC
4460	10/31/2019	19-99-LNG	Blue Water Fuels, LLC
4461	11/8/2019	19-104-LNG	SpotX Energy, LLC
4489	2/10/2020	15-62-LNG	Texas LNG Brownsville LLC
4490	2/10/2020	18-78-LNG	Corpus Christi Liquefaction Stage III, LLC
4491	2/10/2020	19-34-LNG	Annova LNG Common Infrastructure, LLC
4492	2/10/2020	15-190-LNG	Rio Grande LNG LLC
4629	12/8/2020	20-31-LNG	Epsilon LNG LLC <i>Consolidated FTA/non-FTA order cross-referenced above</i>

**APPENDIX C: SHORT-TERM AUTHORIZATIONS**  
**(VACATED IN THEIR ENTIRETY)**

<b>ORDER NUMBER</b>	<b>DATE ISSUED</b>	<b>DOCKET NUMBER</b>	<b>AUTHORIZATION HOLDER(S)</b>
4244	9/6/2018	18-03-LNG	Freeport LNG Expansion, L.P., <i>et al.</i>
4462	11/8/2019	19-105-LNG	SpotX Energy, LLC
4487	1/15/2020	19-133-LNG	Sabine Pass Liquefaction, LLC
4541	5/27/2020	20-14-LNG	Cameron LNG, LLC
4633	12/8/2020	20-127-LNG	Cheniere Marketing, LLC and Corpus Christi Liquefaction, LLC

**APPENDIX D: SHORT-TERM AUTHORIZATIONS**  
**(PARTIALLY VACATED)**

<b>ORDER NUMBER</b>	<b>DATE ISSUED</b>	<b>DOCKET NUMBER</b>	<b>AUTHORIZATION HOLDER</b>
4206	7/6/2018	18-15-LNG	Southern LNG Company, LLC
4508	2/28/2020	19-156-LNG	Cove Point LNG, LP