UNITED STATES OF AMERICA
DEPARTMENT OF ENERGY
OFFICE OF FOSSIL ENERGY AND CARBON MANAGEMENT

In the Matter of	)
EPCILON LNG LLC	) FE Docket No. 20-31-LNG
	)

MOTION FOR LEAVE TO FILE SUPPLEMENT, SUPPLEMENT TO MOTION FOR LEAVE TO INTERVENE OUT OF TIME AND PROTEST, AND REQUEST FOR ADDITIONAL PROCEDURES OF THE SEA OF CORTEZ CITIZENS' ALLIANCE

Pursuant to 10 C.F.R. §§ 590.103, 590.202(d), 590.302, 590.303(d), 590.304(e), 590.305 and 590.310, the Sea of Cortez Citizens' Alliance ("the Alliance") respectfully moves for leave to supplement its Motion for Leave to Intervene Out of Time and Protest filed in this proceeding on October 29, 2026 (the "October 29 Filing"), which is pending, and submits the following new evidence concerning the request of Epcilon LNG LLC ("Epcilon"), dated December 12, 2025 and filed December 15, 2025, to extend the export commencement deadline in DOE/FE Order No. 4629 (the "Request"), noticed at 90 Fed. Reg. 60084 (Dec. 23, 2025).

Summary. On October 18, 2026, at a **public** presentation to the community of Guaymas, Sonora, **led by the applicant's own Chief Executive, Dr. Muthu Chezhian**, who is also Epcilon's designated contact of record in this docket, the project displayed a slide stating that the terminal's design allows it to store **822,000 m³ of LNG**. The record of this proceeding describes storage of 230,000 m³ and 170,000 m³ (Order No. 4629, § IV.B). Three days later, Mexico's Secretary of Energy described storage of "up to 290,000 m³." The Request tells DOE that the project "has not undergone any material changes." The applicant's own chief executive has publicly described a different project. This supplement also places before DOE what Mexico's own authorities have said publicly since then about the project's permits, land, size and vessel traffic, none of which the applicant has disclosed in this docket. Annex N preserves the evidence.

I. LEAVE TO FILE THIS SUPPLEMENT

1. The Alliance's October 29 Filing is pending and appears on DOE's docket for this proceeding. A person "whose motion to intervene is pending" is a "party" under 10 C.F.R. § 590.102(l). To the extent 10 C.F.R. § 590.303(f) is read to defer party status for a late movant, the Alliance requests leave under § 590.302 and asks, in the alternative, that this filing be received as a supplement to its protest under § 590.304(e).

2. Good cause exists. The evidence below arose on October 18 and October 21, 2026, after the comment deadline of January 22, 2026, and, as to the Annex N captures, after the October 29 Filing. DOE has accepted late filings that rest on information that did not exist when the deadline ran (*Alaska LNG Project LLC*, DOE/FECM Order No. 3643-C, at 19–22 (Apr. 13, 2023)), and has granted leave for filings its rules do not expressly provide for where they "will not substantially prejudice the rights of" the applicant (*Lake Charles LNG Export Co.*, Order Nos. 3868-E/4010-E, at 25 (Aug. 22, 2025)). This supplement is short, is confined to the Request, accepts the record as it stands (10 C.F.R. § 590.303(h)), and leaves Epcilon its 15 days to answer (§ 590.302(b)).

II. THE NEW EVIDENCE

3. **The October 18, 2026 public presentation.** Meganoticias reported on October 18, 2026 that about 50 representatives of business and civic organizations in Guaymas, including members of the National Chamber of Commerce (CANACO), attended a presentation of the project "encabezada por el CEO de la compañía, Dr. Muthu Chezhian" ("led by the company's CEO, Dr. Muthu Chezhian"). Other outlets published the same account the same day (Radar Sonora) and the next day (Tribuna, Oct. 19, 2026). A photograph published with the Meganoticias report shows a project slide titled "Soberanía y seguridad energética" that reads:

> "822,000 m³ de GNL que el diseño de la terminal permite almacenar."
> *("822,000 m³ of LNG that the terminal's design allows to be stored.")*

A second photograph published with the same report shows Dr. Chezhian presenting at the event (Annex N-1). Order No. 4629 states that Epcilon is "wholly owned by Dr. Muthu Chezhian," and he signed the Request as "President."

4. **The October 21, 2026 statement of Mexico's Secretary of Energy.** At the President of Mexico's morning press conference, the Secretary of Energy, Luz Elena González Escobar, was reported as stating that the plant "va a tener una instalación de almacenamiento de hasta 290 mil metros cúbicos de gas" ("will have a storage installation of up to 290,000 cubic meters of gas"), with "un máximo de cinco buques al mes, es decir, 60 buques al año" ("a maximum of five vessels a month, that is, 60 vessels a year") (Tribuna, Oct. 21, 2026; Annex N-2). The project's

Mexican environmental authorization reportedly "limita a 60 arribos de buques metaneros por año" (Expansión, Oct. 8, 2026; Annex N-4).

5. **What this record says.** The descriptions of the facility's LNG storage now before DOE are irreconcilable:

Source	Storage
Application, filed March 23, 2020, at 4–5; Order No. 4629, § IV.B (Dec. 8, 2020)	"Two full-containment LNG storage tanks with usable capacity of 230,000 m3 (for the first tank) and 170,000 m3 (for the second tank)" (sum: 400,000 m³). Attachment 1 to the application describes one 230,000 m³ tank and an "[a]dditional 160,000 m3 (future option)."
Epcilon semi-annual report, April 1, 2024, at 2	"maximum storage of 450,000m3": an FSU "of up to 225,000m3" and "an onshore tank of 225,000m3"
EPC award announced August 25, 2025 (Dubai Media Office), cited in the Request at 5	"conversion of two LNG carriers into Floating Storage Units (FSUs)." Capacities not stated; converted LNG carriers typically hold about 125,000–180,000 m³ each (Alliance estimate: about 250,000–360,000 m³ for two)
Project slide, public presentation led by Epcilon's chief executive, October 18, 2026	**822,000 m³**
Mexico's Secretary of Energy, October 21, 2026 (as reported)	"up to 290,000 m³"

6. **What the Request says.** The Request states that Epcilon "does not seek any modification to the scope, configuration, or nature" of the project and that "[t]he project has not undergone any material changes" (Request at 9), while describing a move to "modular, compact FLNG technology" (Request at 3–5). The figure Epcilon's chief executive presented publicly on October 18, 2026 is more than twice the storage on which Order No. 4629 rests and nearly three times the figure given by Mexico's government three days later.

III. WHY THE EVIDENCE BEARS DIRECTLY ON THE REQUEST

7. **Good cause and unchanged scope.** DOE grants extensions "for good cause shown on a case-by-case basis" (90 Fed. Reg. 14411 (Apr. 2, 2025)), asking whether the holder "made good faith efforts" to meet its deadline (*Lake Charles*, at 35; *Gulf LNG*, Order No. 4410-B, at 12–13 (July 28, 2026)). DOE has relied on an extension's not changing a project's nature, scope or design (*Energía Costa Azul*, Order Nos. 4317-C/4364-C, at 8 (Mar. 20, 2026)). Those premises assume the record describes the project the holder intends to build. On this record DOE cannot know which project that is.

8. **The applicant's duty to supplement.** An applicant "shall amend or supplement the application whenever there are changes in material facts or conditions upon which the proposal is based" (10 C.F.R. § 590.204(a)), and its filings must describe "the facilities to be utilized or constructed," supported "by the necessary data or documents" (§ 590.202(b)) and verified "under oath or affirmation" (§ 590.103(b)). Epcilon has filed nothing on the storage it presented to the public.

9. **Marine transport.** DOE has stated that its environmental review of export authorizations "is limited to the 'potential effects associated with marine transport of LNG' to non-FTA countries" (Notice of Withdrawal of Draft EA, DOE/EA-2235, Docket No. 22-167-LNG, at 3 (Apr. 17, 2026); see *Gulf LNG*, at 10). Storage and throughput determine LNG carrier traffic. At the authorized volume of 395 Bcf/yr (about 7.8 mtpa), the Alliance calculates roughly 80 to 100 LNG carrier loadings a year, depending on vessel size, already above the 60 a year reportedly permitted in Mexico; a larger facility would mean more. Every cargo transits the Gulf of California, a UNESCO World Heritage Site on the List of World Heritage in Danger, which lies outside any IMO Emission Control Area. DOE cannot assess those effects, or "take into account the effect of the undertaking" on the World Heritage property (54 U.S.C. § 307101(e)), without sworn, current figures.

IV. DEVELOPMENTS IN MEXICO THAT THE APPLICANT HAS NOT DISCLOSED TO DOE

10. DOE cannot observe events in Mexico directly and relies on the applicant's filings. Those filings omit the following public facts, each documented in Annex N.

11. **Mexico's Government describes a smaller, constrained project that "cannot advance."** According to the official transcript published by the Presidency of Mexico of the press conference of October 21, 2026 (Annex N-2), the Secretary of Energy stated that the plant has "una superficie de 41.7 hectáreas" ("an area of 41.7 hectares"); that "el gas va a salir por un máximo de 5 buques al mes, es decir, 60 buques al año" ("the gas will leave on a maximum of 5 vessels a month, that is, 60 vessels a year"); and that it will have "una instalación de almacenamiento de hasta 290 mil metros cúbicos de gas" ("a storage installation of up to 290,000 cubic meters of gas"). The President stated that "hoy hay un amparo y por eso no puede avanzar" ("today there is an amparo and that is why it cannot advance") and that "[s]e está revisando, de nuevo, todos los impactos ambientales, dado el amparo" ("all the environmental impacts are being reviewed again, given the amparo"). In fairness, on October 16, 2026 the President also stated that there is no environmental damage (El Imparcial, Oct. 17, 2026).

12. **The environmental authorization.** Epcilon told DOE on July 24, 2026 that "Amigo LNG has secured all material permits and approvals required from SEMARNAT, ASEA, SENER and CNE in Mexico," and its October 1, 2026 semi-annual report lists the environmental authorization (Oficio ASEA/UGI/DGGPI/0996/2026) as approved, without qualification. The public record shows: (a) on May 20, 2026, ASEA informed the federal court, "bajo protesta de decir verdad" ("under oath"), that it had not granted any environmental impact permit for the project (Expansión, Oct. 8, 2026); (b) federal courts granted definitive suspensions on May 27 and September 18, 2026; (c) on October 13, 2026 a federal court ordered ASEA to set the authorization aside; and (d) ASEA announced on October 19, 2026 that it will appeal, which does not automatically suspend the order (Meganoticias, Oct. 20, 2026) (Annex N-4, N-6). The authorization itself reportedly limits the project to "60 arribos de buques metaneros por año" and bars marine works from December to April (Annex N-4).

13. **The land.** The Request (at 6) lists a "Land Lease and Use permit" from the Sonora State Government dated September 30, 2022, for "30 years," and a "Coastal Land Title" from the same government, "Lifetime." On October 6, 2026, the Governor of Sonora, Alfonso Durazo, was reported as stating: "No son 54 hectáreas, son 114 hectáreas, pero no es un terreno que hayamos puesto a disposición de la empresa," and that on December 16, 2025 the State "donó a la Secretaría de Marina este terreno de 114 hectáreas" ("It is not 54 hectares, it is 114 hectares, but it is not land we placed at the company's disposal … the State donated this 114-hectare parcel to the Navy") (Dossier Político, Oct. 6, 2026). On October 14, 2026, the Government of Sonora stated in a signed communiqué that "al haberse realizado actos jurídicos posteriores, este quedó sin efectos jurídicos" ("because subsequent legal acts were carried out, it was left without legal effect") (Índice Político, Oct. 15, 2026). The press reports that the 2022 instrument was a free loan for use (comodato), not a lease, and that the Navy stated that the State did not include it in the land file (N+, Oct. 16, 2026) (Annex N-5). The area of the site is described as 41.7 hectares (Secretary of Energy), 54 hectares (Epcilon, 2022), approximately 290 acres (Request at 7) and 114 hectares (Governor of Sonora).

14. **The fishing communities.** Fishing cooperatives of Guaymas and Empalme state that they were never consulted and that the project would take from them the fishing grounds on which they depend. Their representative, José Ramón Ocampo, stated: "No se nos consultó para nada, ni preguntaron … ya lo sabemos se nos quitó también la bahía de Guaymas, no podemos pescar en la bahía de Guaymas, ahora nos están quitando bahía Catalina" ("We were not consulted at all, they did not even ask … we already lost Guaymas Bay, we cannot fish in Guaymas Bay, and now they are taking Catalina Bay from us") (Meganoticias, Oct. 26, 2026; Annex N-7).

15. **Why this bears on the Request.** The Request asks DOE to find good cause on the premises that the project has secured its permits and land and has not materially changed. Each premise is contradicted by public statements of Mexico's own authorities. Under 10 C.F.R. § 590.204(a), Epcilon was obliged to supplement its application as these facts changed; it has not. The Alliance does not ask DOE to apply Mexican law or to review Mexico's permits; it asks DOE to require that the record before it be accurate and sworn.

V. RELIEF REQUESTED

16. The Alliance respectfully requests that DOE:

(a) grant leave to file this supplement and receive Annex N into the record of this proceeding (10 C.F.R. §§ 590.302, 590.404);

(b) under 10 C.F.R. § 590.202(d), require Epcilon to file, verified under oath by an officer with knowledge of the facts (§ 590.103(b)): (i) the facility's current design; (ii) the number, type and volume of each LNG storage unit, onshore or floating; (iii) liquefaction capacity by train; (iv) the expected annual number and size of LNG carrier calls; and (v) an explanation of the 822,000 m^3 figure presented to the public on October 18, 2026, and of how it relates to the 230,000 m^3 and 170,000 m^3 tanks described in Order No. 4629; (vi) the holder, nature, term and current status of every land right on which the project relies, including the instruments listed at page 6 of the Request; and (vii) the current status of the environmental authorization, including the suspensions of May 27 and September 18, 2026, the order of October 13, 2026 and any appeal;

(c) under 10 C.F.R. §§ 590.305 and 590.310, allow the Alliance to file written comments and targeted interrogatories within a reasonable period after Epcilon responds;

(d) hold the Request in abeyance until that information is in the record; and

(e) in the alternative, and in any event, condition any extension on continuing sworn disclosure of these matters (Natural Gas Act § 3(a), 15 U.S.C. § 717b(a); 10 C.F.R. § 590.404), and grant the other relief requested in the October 29 Filing.

17. The Alliance makes no allegation as to intent. It notes only that statements in submissions to DOE are subject to 18 U.S.C. § 1001, which is why sworn clarification is the appropriate remedy.

VI. COMMUNICATIONS

18. Communications regarding this filing should be addressed to the persons on the service list designated in the October 29 Filing: Lic. Ricardo Sevilla, Legal Representative,

RS@seaofcortezalliance.com; and Sea of Cortez Citizens' Alliance, info@seaofcortezalliance.com.

Respectfully submitted,

/s/ Ricardo Sevilla
Lic. Ricardo Sevilla
Legal Representative
Sea of Cortez Citizens' Alliance
RS@seaofcortezalliance.com
November 5, 2026

VERIFICATION

I, Ricardo Sevilla, state that I am the duly authorized legal representative of the Sea of Cortez Citizens' Alliance and am authorized to make this verification on its behalf; that I have read the foregoing filing; that I have personally reviewed the public web pages identified in Annex N at the addresses stated there; that the images in Annex N are true copies of those pages and of the photographs published on them, as they appeared when captured on November 5, 2026; and that the facts stated in the filing are true and correct to the best of my knowledge, information and belief.

/s/ Ricardo Sevilla
Ricardo Sevilla · November 5, 2026

CERTIFICATE OF SERVICE

I certify that on November 5, 2026 I served the foregoing document, with Annex N, by electronic mail upon Epcilon LNG LLC at its contacts of record, Muthu Chezhian, President, Epcilon LNG LLC, 7818 Element Ave., Plano, Texas 75024 (mc@lngalliance.com), and Sarvesh Chezhian (schez@lngalliance.com), and upon each person on the official service list in this proceeding, in accordance with 10 C.F.R. §§ 590.103(b) and 590.107.

/s/ Ricardo Sevilla
Ricardo Sevilla · November 5, 2026

ANNEX N (ATTACHED)

N-1 Meganoticias, Oct. 18, 2026: the 822,000 m³ slide and the CEO at the presentation · N-2 Official transcript of the Presidency of Mexico, Oct. 21, 2026, and Tribuna · N-3 Excerpts of DOE record documents · N-4 Expansión, Oct. 8, 2026: ASEA statement to the court, suspensions and permit conditions · N-5 The land: Governor and Government of Sonora; N+ · N-6 ASEA appeal of the Oct. 13 order · N-7 Fishing communities · N-8 Sources and capture details.

Annex N-1 · Meganoticias, October 18, 2026

"Socializan proyecto AMIGO LNG entre empresarios guaymenses," by Mariela Martínez, Guaymas, 18-10-2026.
`https://www.meganoticias.mx/guaymas/noticia/socializan-proyecto-amigo-lng-entre-empresarios-guaymenses/780287`

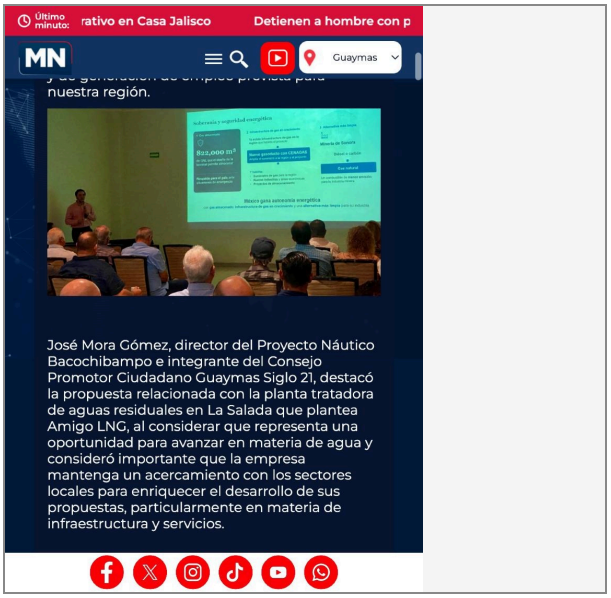


N-1.1 Title, author and date as published.



N-1.2 "…durante una presentación encabezada por el CEO de la compañía, Dr. Muthu Chezhian…"; about 50 attendees, including CANACO.

Annex N-1 (cont.) · Photographs as published in the article



N-1.3 Project slide "Soberanía y seguridad energética": "822,000 m³ de GNL que el diseño de la terminal permite almacenar."



N-1.4 Dr. Muthu Chezhian (right) presenting at the same event.

Annex N-1 (cont.) · Original image files published by Meganoticias



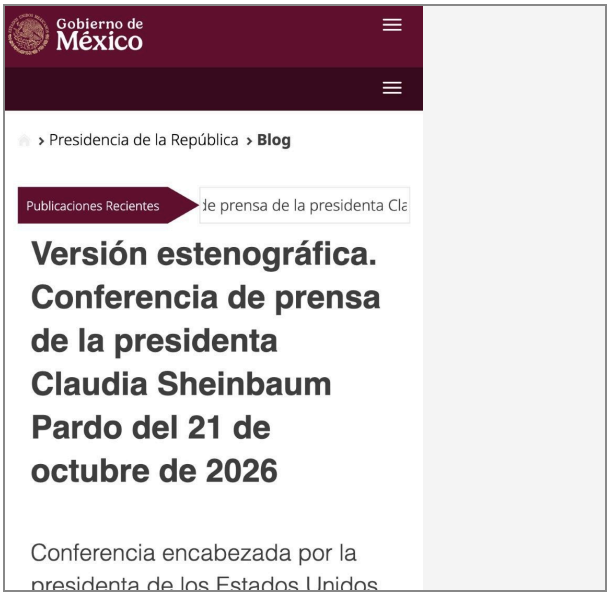
https://www.meganoticias.mx/uploads/noticias/cuerpo/socializan-proyecto-amigo-lng-entre-empresarios-guaymenses-17923600340.jpg



https://www.meganoticias.mx/uploads/noticias/cuerpo/socializan-proyecto-amigo-lng-entre-empresarios-guaymenses-17923600341.jpg

Annex N-2 · Official transcript, Presidency of Mexico, October 21, 2026

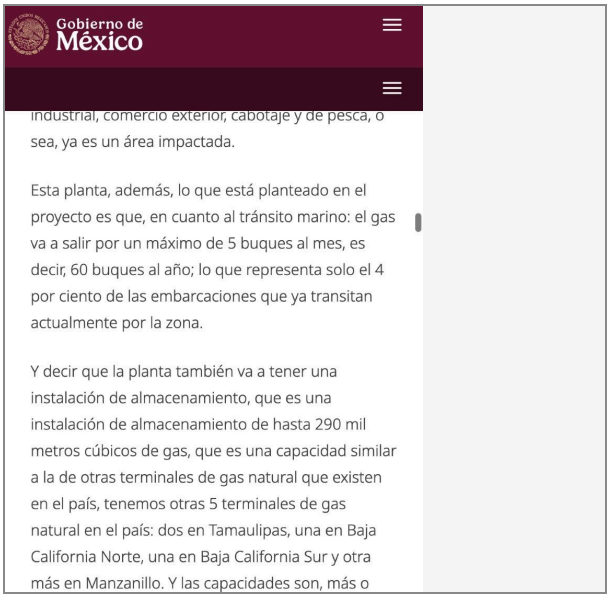
"Versión estenográfica. Conferencia de prensa de la presidenta Claudia Sheinbaum Pardo del 21 de octubre de 2026," gob.mx (Presidencia de la República).
`https://www.gob.mx/presidencia/articulos/version-estenografica-conferencia-de-prensa-de-la-presidenta-claudia-sheinbaum-pardo-del-21-de-octubre-de-2026`



N-2.1 Official page title and date.

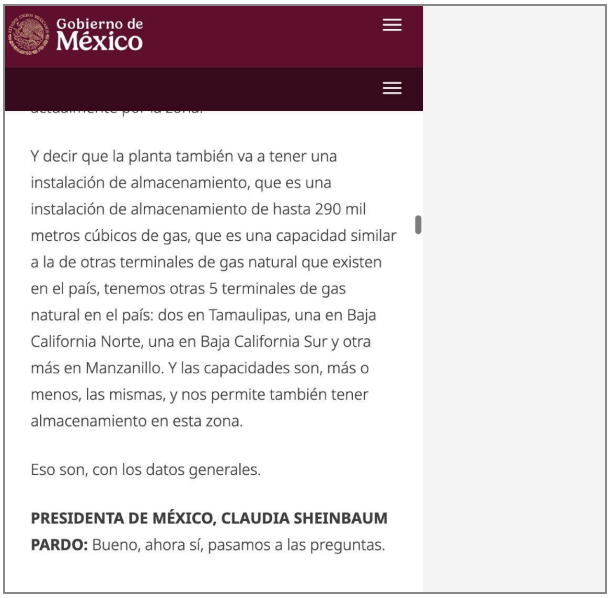


N-2.2 Secretary of Energy: "una superficie de 41.7 hectáreas."



N-2.3 "…un máximo de 5 buques al mes, es decir, 60 buques al año."

Annex N-2 (cont.) · Official transcript and press report

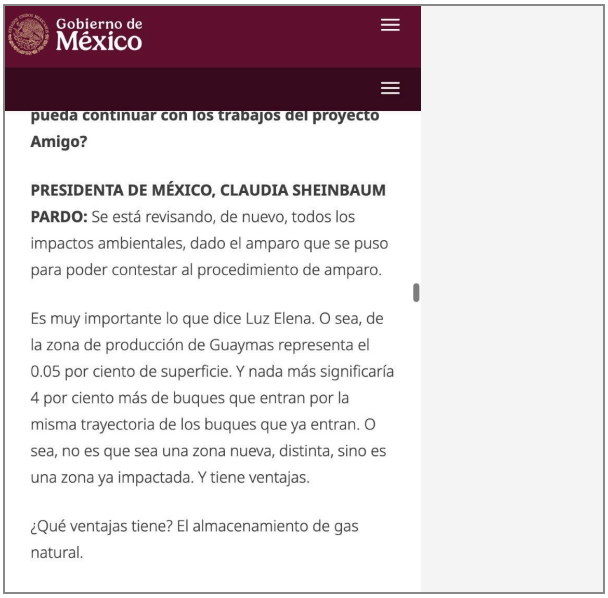

Gobierno de México

Y decir que la planta también va a tener una instalación de almacenamiento, que es una instalación de almacenamiento de hasta 290 mil metros cúbicos de gas, que es una capacidad similar a la de otras terminales de gas natural que existen en el país, tenemos otras 5 terminales de gas natural en el país: dos en Tamaulipas, una en Baja California Norte, una en Baja California Sur y otra más en Manzanillo. Y las capacidades son, más o menos, las mismas, y nos permite también tener almacenamiento en esta zona.

Eso son, con los datos generales.

PRESIDENTA DE MÉXICO, CLAUDIA SHEINBAUM PARDO: Bueno, ahora sí, pasamos a las preguntas.

N-2.4 "…instalación de almacenamiento de hasta 290 mil metros cúbicos de gas."


Gobierno de México

pueda continuar con los trabajos del proyecto Amigo?

PRESIDENTA DE MÉXICO, CLAUDIA SHEINBAUM PARDO: Se está revisando, de nuevo, todos los impactos ambientales, dado el amparo que se puso para poder contestar al procedimiento de amparo.

Es muy importante lo que dice Luz Elena. O sea, de la zona de producción de Guaymas representa el 0.05 por ciento de superficie. Y nada más significaría 4 por ciento más de buques que entran por la misma trayectoria de los buques que ya entran. O sea, no es que sea una zona nueva, distinta, sino es una zona ya impactada. Y tiene ventajas.

¿Qué ventajas tiene? El almacenamiento de gas natural.

N-2.5 President: "Se está revisando, de nuevo, todos los impactos ambientales, dado el amparo…"


Tribuna Sonora

Edición Impresa

representa solo el 4 por ciento de las embarcaciones que ya transitan actualmente por la zona", afirmó la secretaria de Energía.

¿Cuánto gas podría almacenar la instalación?

La planta también contempla una infraestructura de almacenamiento con capacidad de hasta **290 mil metros cúbicos de gas**, detalló la titular de Energía.

"La planta también va a tener una instalación de almacenamiento de hasta 290 mil metros cúbicos de gas", indicó González Escobar, quien comparó esa capacidad con la de otras terminales de gas natural que operan en México.

La funcionaria señaló que el país cuenta con **cinco terminales de gas natural**: dos en Tamaulipas, una en Baja California, otra en Baja California Sur y una más en Manzanillo, Colima. De acuerdo con su explicación, esas instalaciones tienen capacidades de almacenamiento similares a la

N-2.6 Tribuna (F. Tochimani, Oct. 21, 2026) reporting the same statement.
`https://tribuna.com.mx/sonora/2026/10/21/gobierno-de-sheinbaum-informa-sobre-planta-amigo-lng-en-guaymas-superficie-almacenamiento-y-buques_704738/`

Annex N-3 · Excerpts from the DOE record (public documents)

Order No. 4629 (Dec. 8, 2020), § IV.B	"Two full-containment LNG storage tanks with usable capacity of 230,000 m3 (for the first tank) and 170,000 m3 (for the second tank)"; Epcilon is "wholly owned by Dr. Muthu Chezhian"; 395 Bcf/yr. https://www.energy.gov/sites/prod/files/2020/12/f81/ord4629.pdf
Application (filed Mar. 23, 2020), at 4–5; Att. 1	Two tanks of 230,000 m³ and 170,000 m³; Att. 1: "1 x 230,000 m3 tank … Additional 160,000 m3 (future option)." https://energy.gov/sites/prod/files/2020/04/f73/20-31-LNG.pdf
Semi-annual report (Apr. 1, 2024), at 2	"The FEED scope entails a maximum storage of 450,000m3." https://www.energy.gov/sites/default/files/2024-04/Semi%20Annual%20Report%20of%20Epcilon%20LNG%20LLC%20%28FE%20DOCKET%20NO%20%2020_31_LNG%29%20April%202024.pdf
Request (Dec. 12, 2025), at 3–7, 9	"Land Lease and Use permit | Sonora State Government | 30-Sep-2022 | 30 years"; "Coastal Land Title | Sonora State Government | 23-Apr-2024 | Lifetime"; site of "approximately 290 acres"; move to "modular, compact FLNG technology"; "The project has not undergone any material changes." https://www.energy.gov/sites/default/files/2025-12/Epcilon%20LNG%20LLC%20(FE%20DOCKET%20NO%20%2020_31_LNG)%20Request%20for%20Extension%2012122025%20(003).pdf
Supplemental information (July 24, 2026)	"Amigo LNG has secured all material permits and approvals required from SEMARNAT, ASEA, SENER and CNE in Mexico." https://www.energy.gov/sites/default/files/2026-07/Epcilon%20LNG%20LLC%20FE%20Docket%2020-31-LNG%20Order%20No%204629%20Extension%20-%20Supplemental%20Information%2007242026.pdf
Semi-annual report (Oct. 1, 2026)	Lists the MIA as approved (Oficio ASEA/UGI/DGGPI/0996/2026); no mention of the suspensions or of the October 13, 2026 order. https://www.energy.gov/sites/default/files/2026-10/Semi%20Annual%20Report%20of%20Epcilon%20LNG%20LLC%20%28FE%20DOCKET%20NO%20%2020_31_LNG%29%20October%202026.pdf
DOE Notice of Withdrawal, DOE/EA-2235 (Apr. 17, 2026), at 3	NEPA review "is limited to the 'potential effects associated with marine transport of LNG' to non-FTA countries." https://www.energy.gov/sites/default/files/2026-04/withdrawal-ea-2235-mexico-pacific-limited-2026-04.pdf

Annex N-4 · Expansión, October 8, 2026 (Diana Gante)

"Amigo GNL tiene permiso ambiental, pero dos suspensiones frenan sus obras."
https://expansion.mx/empresas/2026/10/08/amigo-gnl-permisos-suspensiones-proyecto-gas-guaymas-sonora


EXPANSIÓN
Revista Digital
Últimas Noticias Empresas Política Economía Internacion
EMPRESAS
Amigo GNL tiene permiso ambiental, pero dos suspensiones frenan sus obras
El proyecto de licuefacción en Guaymas cuenta con permisos energéticos, pero la autorización de ASEA está impugnada y no puede surtir efectos mientras siga el juicio.

N-4.1 Headline.


EXPANSIÓN
Revista Digital
El 20 de mayo, la **Agencia de Seguridad, Energía y Ambiente (ASEA),** un órgano administrativo desconcentrado de la Secretaría de Medio Ambiente y Recursos Naturales (**Semarnat**), informó al juzgado que llevaba el caso, bajo protesta de decir verdad, que hasta ese momento no había otorgado ningún permiso en materia de impacto ambiental para **Amigo GNL** .

Con base en esa declaración, un juez federal otorgó la primera suspensión el 27 de mayo. Pero a finales de agosto, la **coalición ¿Ballenas o Gas?** encontró, en una solicitud presentada por la empresa ante el Departamento de Energía de Estados Unidos para ampliar los plazos de exportación de gas, que Amigo GNL afirmaba contar con una **autorización**

N-4.2 May 20, 2026: ASEA told the court "bajo protesta de decir verdad" that it had not granted any environmental permit; suspension of May 27.


EXPANSIÓN
Revista Digital
bajo determinadas medidas de protección ambiental. Entre las condiciones incluidas en la autorización está la prohibición de realizar obras de construcción en la zona marítima entre **diciembre y abril**, con el objetivo de **proteger la biodiversidad** del Golfo de California.

El resolutivo también limita a **60 arribos de buques metaneros por año** en la ruta del proyecto.

Además, establece medidas para monitorear los efectos del ruido sobre **mamíferos marinos, tortugas, delfines, tiburones y rayas**, así como la obligación de presentar un programa para vigilar el estado de conservación de las islas y áreas protegidas de la zona.

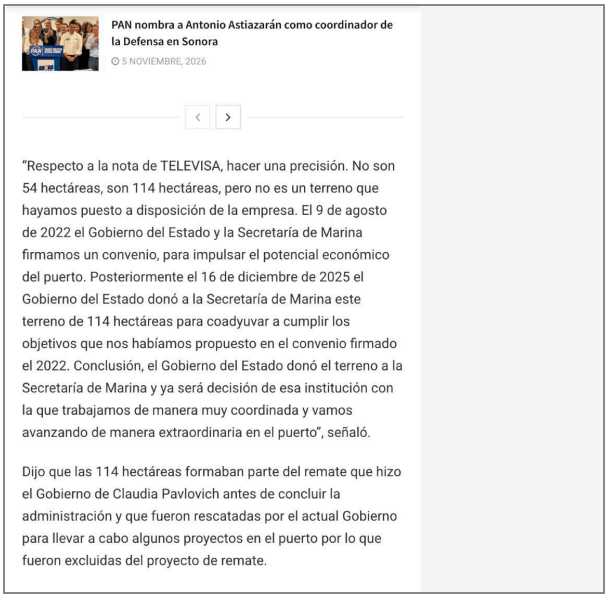
La autorización con condicionantes supone que, desde la perspectiva de la autoridad ambiental, el proyecto puede avanzar siempre que cumpla las

N-4.3 Authorization conditions: no marine works December–April; "60 arribos de buques metaneros por año."

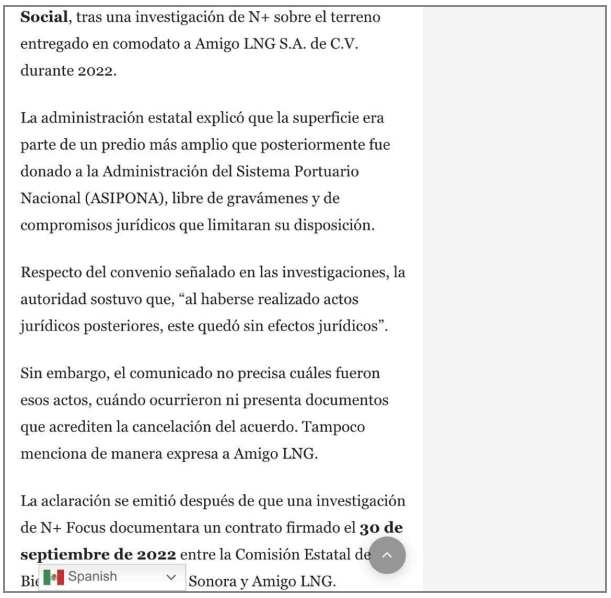
Annex N-5 · The land: Governor of Sonora and Government of Sonora



N-5.1 Dossier Político, Oct. 6, 2026: "Donación de terrenos en Guaymas se hizo a la SEMAR, no a la empresa Amigo LNG, aclara Durazo." https://dossierpolitico.com/2026/10/06/donacion-de-terrenos-en-guaymas-se-hizo-a-la-semar-no-a-la-empresa-amigo-lng-aclara-durazo/



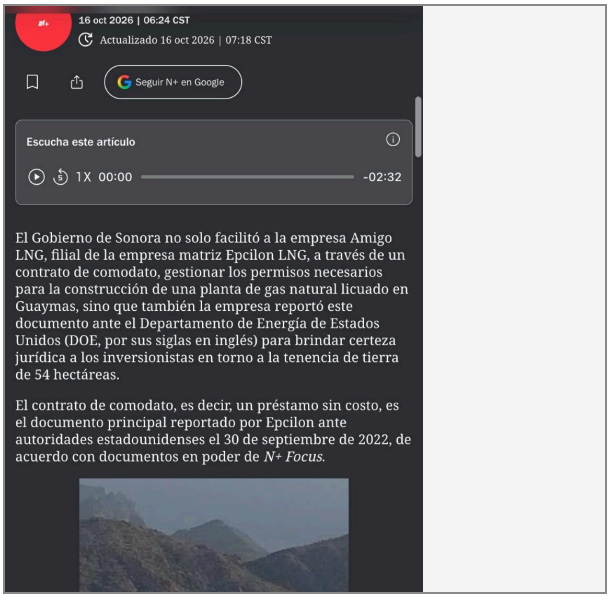
N-5.2 Governor Durazo: "No son 54 hectáreas, son 114 hectáreas, pero no es un terreno que hayamos puesto a disposición de la empresa…"



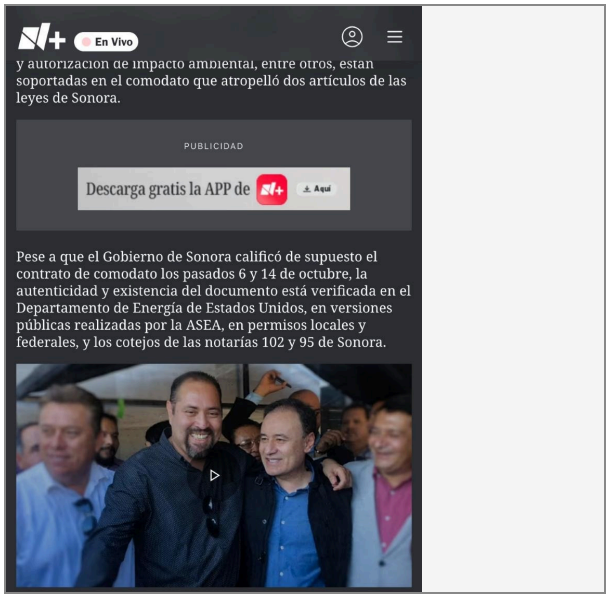
N-5.3 Índice Político, Oct. 15, 2026: Government of Sonora communiqué of Oct. 14: "al haberse realizado actos jurídicos posteriores, este quedó sin efectos jurídicos." https://indicepolitico.com/gobierno-de-sonora-afirma-que-quedo-sin-efecto-el-comodato-de-54-hectareas-para-planta-de-gas/

Annex N-5 (cont.) · N+, October 16, 2026

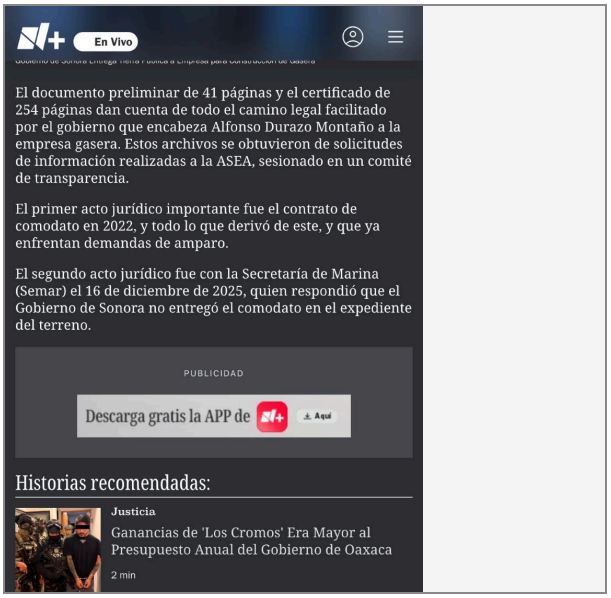
"La Empresa Amigo LNG Presentó en EUA el Contrato de Comodato que Durazo Niega."
`https://www.nmas.com.mx/nmas-focus/politica/durazo-insiste-en-negar-contrato-de-comodato-y-empresa-amigo-lng-lo-reporta-en-eua/`



N-5.4 The comodato (free loan) "es el documento principal reportado por Epcilon ante autoridades estadounidenses el 30 de septiembre de 2022."



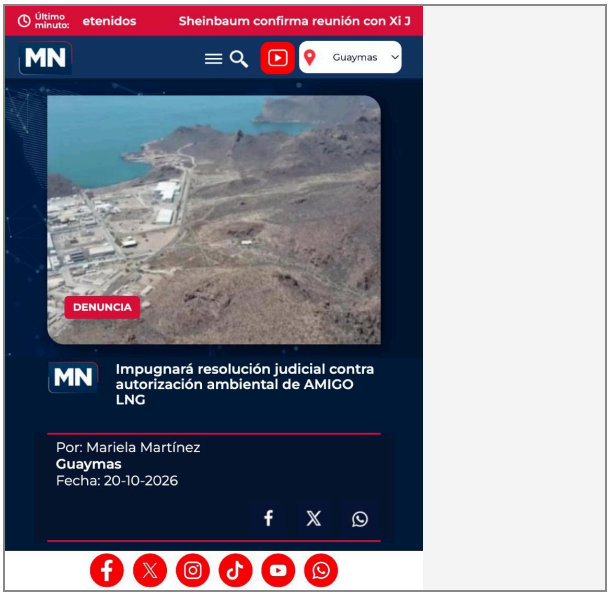
N-5.5 Sonora called the contract "supuesto" on Oct. 6 and 14.



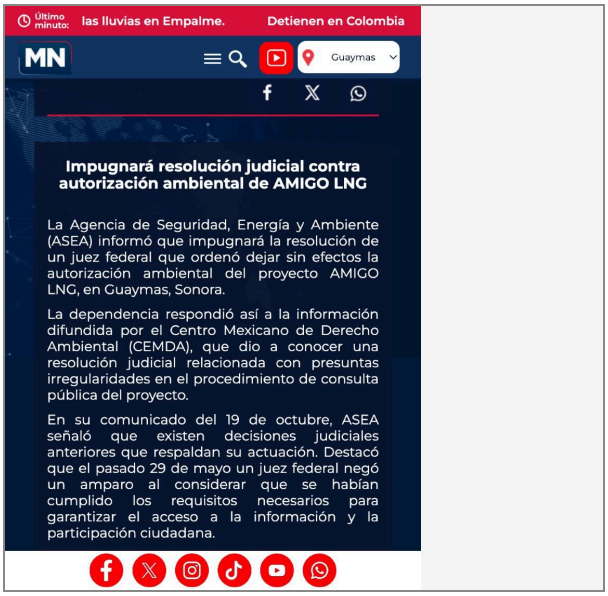
N-5.6 The Navy (Dec. 16, 2025): "el Gobierno de Sonora no entregó el comodato en el expediente del terreno."

Annex N-6 · ASEA appeal of the October 13, 2026 order

Meganoticias, "Impugnará resolución judicial contra autorización ambiental de AMIGO LNG," Mariela Martínez, Oct. 20, 2026.
`https://www.meganoticias.mx/guaymas/noticia/impugnar%C3%A1-resoluci%C3%B3n-judicial-contra-autorizaci%C3%B3n-ambiental-de-amigo-lng/780957`



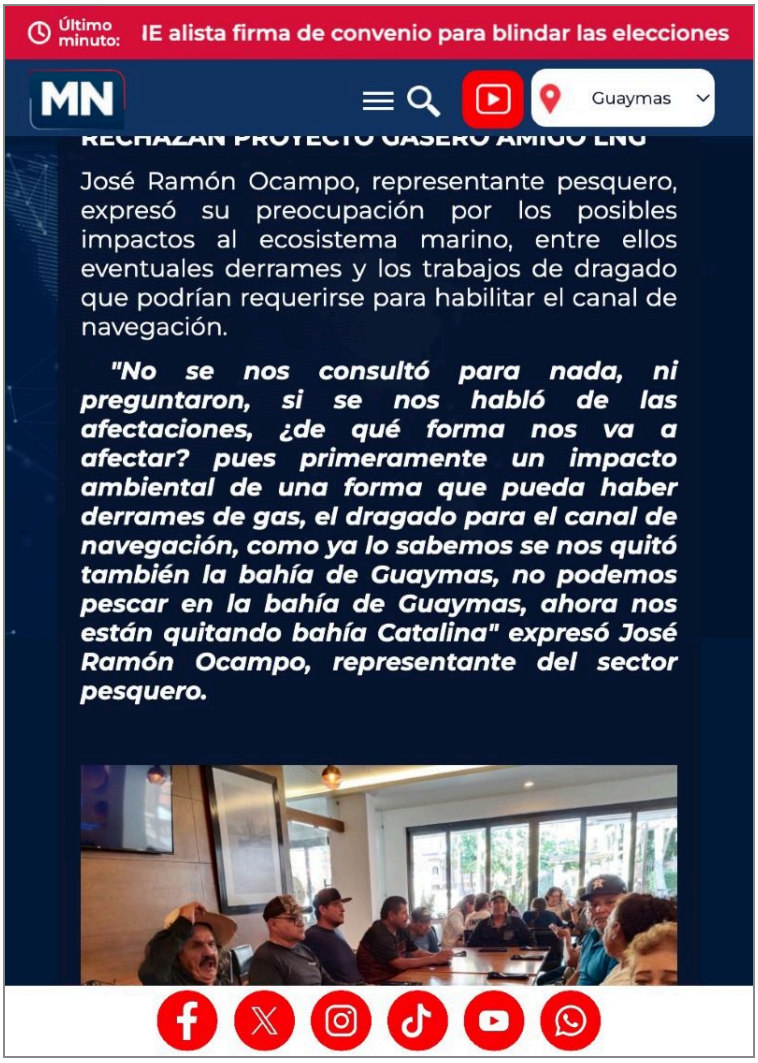
N-6.1 Title, author, date.



N-6.2 ASEA will appeal the order of a federal judge "que ordenó dejar sin efectos la autorización ambiental"; the article adds that the appeal "no suspende automáticamente los efectos de la orden vigente."

Annex N-7 · The fishing communities of Guaymas and Empalme

Meganoticias, "Ribereños exigen diálogo con representantes de AMIGO LNG," Daniel Barriga M., Oct. 26, 2026.
`https://www.meganoticias.mx/guaymas/noticia/ribere%C3%B1os-exigen-di%C3%A1logo-con-representantes-de-amigo-lng/782769`



N-7.1 José Ramón Ocampo, fishing sector representative: "No se nos consultó para nada…"

Annex N-8 · Sources and capture details

All captures in Annex N were made on November 5, 2026 from the public web pages at the addresses shown, without alteration of content. All information in this Annex is public.

Corroborating reports of the October 18 presentation: Radar Sonora (Oct. 18, 2026) https://www.radarsonora.com/aplauden-empresarios-comerciantes-y-grupos-sociales-proyecto-de-amigo-lng/; Tribuna (Oct. 19, 2026) https://tribuna.com.mx/sonora/2026/10/19/empresarios-y-comerciantes-respaldan-proyecto-de-planta-de-gas-natural-amigo-lng-en-guaymas_704073/.

President's statement of Oct. 16, 2026 that there is no environmental damage: El Imparcial (Oct. 17, 2026) https://www.elimparcial.com/mexico/2026/10/17/sheinbaum-descarta-dano-ambiental-por-la-planta-de-gas-natural-amigo-gnl-en-guaymas-sonora-mientras-dos-suspensiones-judiciales-mantienen-frenadas-las-obras/.

EPC award: Dubai Media Office (Aug. 25, 2025) https://www.mediaoffice.ae/en/news/2025/august/25-08/drydocks-world-wins-contract-for-worlds-largest-floating-lng-facility-off-mexico.

Federal court orders (suspensions of May 27 and Sept. 18, 2026; order of Oct. 13, 2026) are cited as reported in the press and in ASEA's public statements; the Alliance has not yet obtained the court records.