Sea of Cortez air: unregulated, unmonitored NOx

A proposal for a joint campaign · Sea of Cortez Citizens' Alliance · November 2026

Dear colleagues,

One harm from the industrial build-out in the Sea of Cortez is going largely unnoticed: **nitrogen oxides (NOx)** from the plants and their ships. The companies don't report them, so we built our own estimate from public data.

What we found (Alliance estimates*)

2,000–18,700 t
of NOx a year from the four projects together and their ships

≈2,700 t
a year, at most, from Amigo LNG alone in Guaymas–Empalme (208,294 people), where no public NO_2 monitoring is reported

60 vs 80–100
Mexico caps Amigo at 60 LNG carriers a year; the volume DOE authorized implies 80 to 100

Why it matters

1. **Health.** NO_2 worsens asthma and lung disease, especially in children and older people, and NOx forms ozone and fine particles. The WHO guideline is 10 µg/m³ a year.
2. **The sea.** Nitrogen deposition contributes to algal blooms, putting shrimp and oyster farms and local fisheries at risk. This is a UNESCO World Heritage site in Danger.
3. **Almost no rules.**
    - **Mexico has not ratified MARPOL Annex VI**, so it cannot request an Emission Control Area. A Mexican ECA was drafted with the US and Canada between 2009 and 2018 but never submitted to the IMO.
    - **Mexico's standard excludes gas turbines** from its main NOx limits; only an interim 70 ppmV limit applies.
    - **There is almost no public air monitoring.**

What we propose to push for together

1. **NOx limits, continuous monitoring with public data, and fence-line NO_2 monitors**, written into each project's permits.
2. **Public NO_2 stations in Guaymas, Empalme, Puerto Libertad and Topolobampo.**
3. **A Gulf-wide strategic environmental assessment**, including cumulative plant and ship emissions.
4. **A 10-knot speed limit and shore power** at the Guaymas and Topolobampo ports, which cuts emissions and whale strikes.

5. **Mexico's ratification of MARPOL Annex VI** and revival of the 2018 ECA.
6. **In the US dockets:** DOE now limits its environmental review to "marine transport of LNG", which is exactly where tanker NOx belongs.

Would you join us? We'd be glad to share the full analysis with its sources. And please sign and share our global petition: `https://www.change.org/p/save-the-sea-of-cortez-no-gas-lng-no-ammonia-no-methanol-all-of-them-together`

Sincerely,
Sea of Cortez Citizens' Alliance · www.seaofcortezalliance.com

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* Alliance estimates from public sources: US LNG terminal NOx intensity (Environmental Integrity Project, 2025); IMO Tier II/III (MARPOL Annex VI, Reg. 13); DOE Order 4629; ASEA authorization (60-carrier cap, Expansión, Oct. 8, 2026); INEGI 2020; NOM-085-SEMARNAT-2011; ProAire Sonora 2017–2026; Commission for Environmental Cooperation (ECA proposal, 2013–2018); WHO Air Quality Guidelines 2021.



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