

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

Mexico Pacific Limited LLC

Docket Nos. 18-70-LNG
22-167-LNG

**Joint Protest of Public Citizen, Inc., Natural Resources Defense
Council and Sierra Club Opposing Mexico Pacific Limited's
Notice of Change in Control**

Pursuant to the December 12, 2025 *Federal Register* notice posted by United States Department of Energy, Office of Fossil Energy and Carbon Management in the above-entitled proceeding,¹ Intervenor Public Citizen, Inc., Natural Resources Defense Council and Sierra Club submit this protest for the reasons stated below:

Mexico Pacific Limited LLC ("Mexico Pacific") is developing a proposed LNG export facility in Sonora, Mexico utilizing natural gas sourced from the United States. On March 5, 2025, Mexico Pacific submitted a Notice of Change in Control ("CIC") in response to which Intervenor filed a timely protest. On November 24, 2025, Mexico Pacific filed the Fourth Supplement to its CIC Notice, stating that MXP Holdings, LLC is the parent company of Mexico Pacific and listing four entities that hold membership interests in MXP Holdings:²

- Windsor Cliff Sponsor LLC with its managing member Chapel Ridge Partners, LP, controlled by trusts owned by an unnamed U.S. citizen (70%).
- LDM Strategic Holdings, LLC (10%).
- Avila Blue, LLC (10%).
- Sonvapor LP (10%).

Intervenor protests the Fourth Supplement because of Mexico Pacific's continuing failure to disclose the identities of the natural persons that exercise management control of MXP Holdings, including control of any of the four entities listed as holding a membership interest in MXP Holdings. In light of that continuing failure, Intervenor submits that the requested Change in Control is contrary to the public interest.

The Department of Energy's change in control regulations require applications seeking to export natural gas from the United States to identify "all the participants in the transaction, including the parent company, if any, and identification of any corporate or other affiliations among the participants" with "a rebuttable presumption that control

¹ www.govinfo.gov/content/pkg/FR-2025-12-12/pdf/2025-22638.pdf

² www.energy.gov/hgeo/mexico-pacific-limited-llc-mpl-fe-dkt-no-18-70-lng

exists ... from the ownership or the power to vote, directly or indirectly, 10 percent or more of the voting securities of such entity.”³

Mexico Pacific’s Fourth Supplement cannot be reconciled with these Department regulations. Failure to identify the persons owning the limited liability corporations that control an applicant seeking permission to export gas violates the letter and spirit of those regulations—and disservices the public interest that they are intended to serve—because a natural person that controls an LLC is a “participant in the transaction” whose identify is required to be disclosed. Absent the required public disclosure of the natural persons that control Chapel Ridge Partners, LDM Strategic Holdings, Avila Blue and Sonvapor, neither the Department nor Intervenor—or any other member of the public—are able to determine the actual identity of either the management of the current permit applicant or, more specifically, the anonymous persons who, as reflected in the requested Change in Control and its Supplements, actually now control Mexico Pacific.

For example, incorporation records filed by LDM Strategic Holdings LLC with the Florida Department of State conceal the individuals that control its upstream ownership, as only the corporate registration agent is disclosed.⁴ Florida Department of State records for Avila Blue LLC names Ivan Rafael Sandra Silva and Gabriela San Claudio Summonte as its managers and affiliation with both Avila Alternative Investments Ltd.⁵ and Alize Energy,⁶ and listing a Houston, Texas address.⁷ The Ontario, Canada Ministry of Public and Business Service Delivery⁸ business records for Sonvapor LP records MPL AGS GP LLC as its general partner with an Austin, Texas corporate registration agent address.

Intervenor respectfully submit that the public interest does not allow a change in control that reveals nothing but a shell company and unnamed individuals as the ultimate upstream owners. Mexico Pacific’s continuing non-disclosure is manifestly inconsistent with both the Department’s regulations and the public interest that they seek to protect. Accordingly, its Notice of Change in Control (including its Fourth Supplement) must be rejected.

³ 79 FR 65541, www.federalregister.gov/documents/2014/11/05/2014-25143/procedures-for-changes-in-control-affecting-applications-and-authorizations-to-import-or-export

⁴ <https://search.sunbiz.org/Inquiry/CorporationSearch/ConvertTiffToPDF?storagePath=COR%5C2025%5C0602%5C00192514.Tif&documentNumber=L25000234728>

⁵ <https://search.sunbiz.org/Inquiry/CorporationSearch/GetDocument?aggregateId=flal-l23000533273-a1943385-05ea-4105-ace2-4518b380fcc9&transactionId=l23000533273-a5d09f62-8824-4aef-ab95-1fd6e1c09ddc&formatType=PDF>

⁶ www.rapidanenergy.com/board-of-advisors-ivan-sandra

⁷ <https://search.sunbiz.org/Inquiry/CorporationSearch/ConvertTiffToPDF?storagePath=COR%5C2023%5C1204%5C20650292.tif&documentNumber=L23000533273>

⁸ www.appmybizaccount.gov.on.ca/onbis/master/viewInstance/view.pub?id=3abd3bce3ccoad2a3cc11d6c56d24b25b6do8093d24e72f3

Respectfully submitted,

Tyson Slocum
Energy Program Director
Public Citizen, Inc.
215 Pennsylvania Ave SE
Washington, DC 20003
(202) 454-5191
tslocum@citizen.org

Jamie Y. Lee
International Climate Specialist
Natural Resources Defense Council
1152 15th Street NW, Suite 300
Washington, DC 20005
jlee@nrdc.org

Doug Hayes
Staff Attorney
Sierra Club Environmental Law Program
1650 38th St. Suite 102W
Boulder, CO 80301
(303) 449-5595 x100
doug.hayes@sierraclub.org

Joel Reynolds
Senior Attorney, Nature
Natural Resources Defense Council
1314 2nd Street
Santa Monica, CA 90401
jreynolds@nrdc.org

Filed December 29, 2025

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

IN THE MATTER OF)	
)	FE Docket Nos. 18-70-LNG
Mexico Pacific Limited, LLC)	22-167-LNG

NATURAL RESOURCES DEFENSE COUNCIL VERIFICATION

Pursuant to 10 C.F.R. § 590.103(b), I hereby verify under penalty of perjury that I am authorized to execute this verification, that I have read the foregoing document, and that the facts stated therein are true and correct to the best of my knowledge.

Dated: December 28, 2025

/s/ Joel Reynolds

Joel Reynolds

Senior Attorney, Nature

Natural Resources Defense Council

1314 2nd Street

Santa Monica, CA 90401

jreynolds@nrdc.org

UNITED STATES OF AMERICA
DEPARTMENT OF ENERGY
OFFICE OF FOSSIL ENERGY

IN THE MATTER OF)	
)	
Mexico Pacific Limited, LLC.)	FE Docket Nos. 18-70-LNG
)	22-167-LNG

SIERRA CLUB VERIFICATION

Pursuant to 10 C.F.R. § 590.103(b), I, Douglas Hayes, hereby verify under penalty of perjury that I am authorized to execute this verification, that I have read the foregoing document, and that the facts stated therein are true and correct to the best of my knowledge.

Executed in Montpelier, VT on December 28, 2025.

/s/ Doug Hayes
Doug Hayes
Senior Attorney
1650 38th St., Ste. 102W
Boulder, CO 80301
doug.hayes@sierraclub.org
303-449-5595 ext. 100
Attorney for Sierra Club

VERIFICATION

Pursuant to 10 CFR § 590.103(b), I, Tyson Slocum, declare that I am Energy Program Director for Public Citizen, Inc. and am authorized to make this verification; that I have authored and read the foregoing filing and that the facts therein stated are true and correct to the best of my knowledge, information, and belief.

Pursuant to 28 U.S.C § 1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on December 29, 2025.

Tyson Slocum
Energy Program Director
Public Citizen, Inc.
215 Pennsylvania Ave SE
Washington, DC 20003

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon the applicant and intervenors for this docketed proceeding in accordance with 10 CFR § 590.107(b).
Dated at Washington, DC this 29th day of December 2025.

Signed,

Tyson Slocum
Energy Program Director
Public Citizen, Inc.
215 Pennsylvania Ave SE
Washington, DC 20003
(202) 454-5191
tslocum@citizen.org