

UNITED STATES FEDERAL ENERGY REGULATORY COMMISSION
PETITION TO REINSTATE AUTHORIZATION UNDER SECTION 3 OF THE NATURAL GAS ACT
DOCKET NO. CP16-480-000
DATE: March 14, 2025

SUBMITTED BY:

OA Partners LLC, doing business as OA LNG
on behalf of its subsidiary, ANN LNG Limited Liability Company
Address: 10410 West Caron Drive, Sun City, Arizona 85351
Contact: Mark Kekkonen, Managing Member
Phone: 602-826-3699 | Fax: 602-926-0344 | Email: mark@oapartners.llc

I. PETITION

OA Partners LLC, doing business as OA LNG, on behalf of its subsidiary ANN LNG Limited Liability Company (ANN LNG LLC), petitions the Federal Energy Regulatory Commission (FERC) under Section 3 of the Natural Gas Act (15 U.S.C. § 717b) to reinstate authorization previously granted under Docket No. CP16-480-000. Originally issued to Annova LNG Common Infrastructure, LLC on November 20, 2019, this authorization permitted the siting, construction, and operation of a liquefied natural gas (LNG) export terminal on the Brownsville Ship Channel, Cameron County, Texas, with a capacity of 6.95 million metric tons per annum (Mtpa). The certificate expired on April 19, 2024, and reinstatement is sought pursuant to Executive Order 14111 (February 14, 2025) to revive the Brownsville America First LNG Terminal as part of a broader OA LNG strategy targeting 17.8 Mtpa in total exports by Q3 2027.

II. BACKGROUND

1. **Original Authorization:** On November 20, 2019, FERC issued an order under Docket No. CP16-480-000 authorizing Annova LNG Common Infrastructure, LLC to construct and operate an LNG export terminal with six liquefaction trains, two full-containment storage tanks (each 160,000 cubic meters), and marine loading facilities on a 731-acre site leased from the Brownsville Navigation District (latitude 26°00'20.09"N, longitude 97°16'02.70"W).
2. **Environmental Review:** The Final Environmental Impact Statement (FEIS), issued November 16, 2018, assessed the project's impacts and remains valid under FERC practice for reinstatement purposes.

3. Project Cancellation: Annova LNG canceled the project on March 22, 2021, citing market conditions, and the certificate expired on April 19, 2024, per the five-year completion deadline.
4. Revival by ANN LNG LLC: OA Partners LLC established ANN LNG LLC, registered March 7, 2025 (Entity ID 23796708), to assume and advance the project under the original docket.

III. BASIS FOR REINSTATEMENT

1. Executive Order 14111: Issued February 14, 2025, EO 14111 directs federal agencies to expedite LNG export infrastructure approvals by leveraging prior environmental reviews where applicable. ANN LNG LLC relies on the 2018 FEIS to streamline this reinstatement, consistent with EO 14111's mandate to enhance U.S. energy exports.
2. Export Plan: The terminal will export 6.95 Mtpa to Japan using six Q-Max tankers (approximately 266,000 m³ capacity each), forming part of a 16-tanker fleet supporting OA LNG's goal of 17.8 Mtpa across its portfolio by Q3 2027. This includes synergy with the Jordan Cove LNG Terminal (Accession 20250310-5035).
3. Economic and Job Creation: A pending \$1.08 billion MARAD Title XI loan application, submitted to the U.S. Maritime Administration in Q1 2025, will fund 12 U.S.-built LNG tankers, creating approximately 2,000 shipbuilding jobs and aligning with America First economic priorities. Terminal construction will generate 1,500–3,000 direct jobs in Texas.
4. Community Engagement: ANN LNG LLC proposes offering 10–20% local equity to the Carrizo/Comecrudo tribes, whose ancestral lands overlap the site, to address historical opposition and foster community support, with negotiations planned for Q2 2025.

IV. PROJECT DESCRIPTION

The Brownsville America First LNG Terminal will utilize the 731-acre site originally permitted, featuring:

- Six liquefaction trains, each producing approximately 1.158 Mtpa (total 6.95 Mtpa).
- Two 160,000 m³ full-containment LNG storage tanks.
- Marine facilities with two berths for Q-Max tanker loading.

- Ancillary infrastructure, including power generation and utilities, to be detailed in the enclosed Updated Project Plan.

V. ACTION REQUESTED

ANN LNG LLC requests FERC:

1. Reinstate authorization under Docket No. CP16-480-000, transferring it from Annova LNG Common Infrastructure, LLC to ANN LNG LLC.
2. Grant approval to site, construct, and operate the terminal by Q2 2027, enabling construction to commence and operations to begin by Q3 2027.
3. Establish a new five-year deadline of March 7, 2030, to complete the project, accounting for regulatory and construction timelines.

VI. SUBMISSION

This petition is filed electronically via FERC's eFiling system (<https://ferconline.ferc.gov>) under Docket No. CP16-480-000, Submission Type: "Petition to Reopen," referencing Submission ID 1603894. A courtesy copy is provided to:

Office of Energy Projects
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

VII. CONCLUSION

Reinstating CP16-480-000 advances U.S. LNG export capacity, supports economic growth, and strengthens international energy partnerships, particularly with Japan. ANN LNG LLC stands ready to provide additional information or address FERC inquiries to expedite this process.

Respectfully submitted,

Mark Kekkonen
Managing Member
OA Partners LLC
March 14, 2025

Enclosures:

- Updated Project Plan
- Annova LNG Agency Communications Summary (July–September 2016)

