

June 9, 2025

Hironori Kamezawa
President & Group CEO
Mitsubishi UFJ Financial Group
1-4-5, Marunouchi
Chiyoda-ku, Tokyo, Japan

**Re: Concerns regarding the role of MUFG in Advising & Potentially
Financing the Saguaro Energia LNG Project**

Dear Mr. Kamezawa:

ClientEarth USA and Natural Resources Defense Council (“NRDC”) write to you today to express serious concerns regarding Mitsubishi UFJ Financial Group (MUFG)’s role as Financial Advisor to U.S.-based Mexico Pacific Limited (“Mexico Pacific”)¹ in constructing a proposed Liquefied Natural Gas (“LNG”) export terminal known as Saguaro Energia LNG (“Saguaro” or “Saguaro LNG”). The proposed project would be constructed on the Gulf of California in northwestern Mexico, in a region that is globally recognized for its exceptional biodiversity. If constructed, the terminal is expected to both exacerbate the climate crisis and accelerate the loss of critical biodiversity habitat.

ClientEarth USA is an independent 501(c)(3) public interest law firm that is part of a network of entities, branches, representative offices, subsidiaries and partners across Europe, Asia and the Americas. NRDC is a U.S.-based 501(c)(3) environmental legal advocacy and membership organization established in 1970, incorporated in New York and consisting of a network of offices in the United States and internationally.

¹ BnAmericas, *Mexico Pacific advances with financing for LNG terminal* (April 17, 2020), <https://www.bnamericas.com/en/news/mexico-pacific-advances-with-financing-for-lng-terminal> (<https://perma.cc/V586-8XBL>); Energy Analytics Institute, *Mexico Pacific Working with Financial Advisors for Financing for Saguaro LNG, Executive Says* (October 24, 2024), <https://energy-analytics-institute.org/2024/10/24/mexico-pacific-working-with-financial-advisors-executive-says/> (<https://perma.cc/2KKT-E3UK>).

With this letter, we bring to your attention the significant financial, reputational and legal risks to MUFG that its continued association with Mexico Pacific entails. Because the essential purpose of MUFG's role in support of Mexico Pacific is to facilitate, support, enable, or attract investment in – that is, financing of – the project, it would be unreasonable to characterize MUFG's role as meaningfully different from those who directly finance the project. We believe that the Saguaro LNG project fails to meet MUFG's own standards of sustainability, risk management and corporate governance,² on a number of grounds including that (1) it poses an unreasonable risk of irreparable harm to irreplaceable natural resources internationally recognized for their “extraordinary importance” (harms that include death, injury, and significant disruption to endangered whales and other protected marine species and their habitat), and (2) it exposes MUFG and its investors to material risks of reputational damage and financial loss. For these reasons, which are discussed in more detail below, we urge MUFG to reconsider its involvement in the Saguaro LNG project.

BACKGROUND ON SAGUARO LNG

The Saguaro LNG project is an LNG export terminal proposed for construction in Puerto Libertad, in the state of Sonora, Mexico, along the Gulf of California. In its initial phase of three liquefaction trains, Saguaro LNG would receive about 2.8 billion cubic feet per day of fossil gas from the Permian Basin, a major oil and gas producing area in west Texas and southeastern New Mexico, and process 15 million metric tons per year (“MMTPA”) of the super-chilled liquified fossil gas for export to Asia.³ With a projected full build-out of six trains, the amount processed by Saguaro LNG and transported overseas is estimated to double to 30 MMTPA.⁴ Production at this scale would bring significant industrial activity to an area of high environmental sensitivity.

Although Mexico Pacific originally stated its intention to secure a final investment decision (“FID”) in early 2021, with operations commencing in 2024,⁵ the project has yet to obtain FID. Moreover, due to pending litigation, construction has not yet begun. Additionally, the terminal's gas supply would be contingent on construction of the 250-kilometer Saguaro Connector

² MUFG, Policies and Guidelines, <https://www.mufg.jp/english/csr/policy/index.html> (<https://perma.cc/UX86-XAVH>) (noting in particular the Environmental Social Policy Framework, Human Rights Policy Statement, Risk Management: Basic Policy, and MUFG Corporate Governance Policies).

³ Mexico Pacific, Saguaro Energía, <https://mexicopacific.com/saguaro-energia/> (<https://perma.cc/QX8S-C8W6>)

⁴ *Id.* Video at 4:02

⁵ S&P Market Intelligence, Mexico Pacific is lining up deals for 'black pearl of North American LNG (April 21, 2021), <https://www.spglobal.com/marketintelligence/en/news-insights/latest-news-headlines/mexico-pacific-is-lining-up-deals-for-black-pearl-of-north-american-lng-63678274>

Pipeline in the U.S. and the 800-kilometer Sierra Madre Gas Pipeline in Mexico, both of which are now facing legal challenges, as detailed below.

FINANCIAL RISKS FOR MUFG

Market Risks and Operational Disruptions Surrounding Mexico Pacific and Saguaro LNG

Mexico Pacific appears to be facing material risks to its business activities, which are highly likely to cause further disruptions and delays to its project development plans and thereby increase MUFG's costs of doing business with this company.

In February, the company's principal equity owner, Quantum Capital Group, sold off its ownership stake.⁶ A month later, in a notice filed with the U.S. Department of Energy on March 6, Mexico Pacific filed for a Change in Control to Mexico Pacific Holdings L.P., which has recently been formally protested by NRDC and others.⁷ In April, after only one year on the job, Mexico Pacific's CEO Sarah Bairstow abruptly announced that she would be leaving the company in early May.⁸ Mexico Pacific is now trimming down and reshuffling its staff⁹ in both the U.S. and Singapore, and it is reportedly seeking to renegotiate its construction contracts and supply purchase agreements with buyers due to rising costs.¹⁰ Additional operational disruptions and delays can be anticipated as a result of violence from drug cartels and political risks, including the tariff wars with the U.S., as well as logistical challenges that have plagued other LNG projects along Mexico's Pacific Coast.¹¹

These developments alone raise serious concerns about the viability and investment soundness of Saguaro LNG. However, clear market dynamics further suggest significant stranded asset

⁶ Energy Analytics Institute, *Quantum Capital's 30 MTPA Mexico Pacific Project Falls Apart as Originally Envisioned* (February 24, 2025), <https://energy-analytics-institute.org/2025/02/24/quantum-capitals-30-mtpa-mexico-pacific-project-falls-apart/> (<https://perma.cc/9872-GYHP>). See also Bloomberg Law, *Quantum Capital Hires Lazard for Potential LNG Producer Sale* (February 6, 2025), <https://news.bloomberglaw.com/private-equity/quantum-capital-engages-lazard-for-potential-lng-producer-sale>. Quantum Capital Group has invested with Mexico Pacific since 2021, and has shared numerous executives with Mexico Pacific over the course of its investment.

⁷ Mexico Pacific Limited LLC, U.S. Department of Energy, Office of Fossil Energy and Carbon Management, Nos. 18-70-LNG and 22-167-LNG, Protest of Public Citizen, Inc., Natural Resources Defense Council and Sierra Club (May 22, 2025), <https://www.energy.gov/sites/default/files/2025-05/MexicoPacificKronos1.pdf> (<https://perma.cc/GJW8-7CGC>).

⁸ Bnamericas, *Mexico Pacific CEO To Join Competitor As Clouds Gather Over US\$15bn LNG Project* (April 16 2025), <https://www.bnamericas.com/en/news/mexico-pacific-ceo-to-join-competitor-as-clouds-gather-over-us15bn-lng-project> (<https://perma.cc/H999-GPNP>).

⁹ See Energy Analytics Institute, *supra* note 6.

¹⁰ Reuters, *US LNG Exporters Seek to Renegotiate Deals to Cover Rising Costs* (March 10, 2025), <https://www.reuters.com/business/energy/ceraweek-us-lng-exporters-seek-renegotiate-deals-cover-rising-costs-2025-03-10/>.

¹¹ OilPrice.com, *Mexico's LNG Ambitions Face Reality Check* (March 16, 2025), <https://oilprice.com/Energy/Natural-Gas/Mexicos-LNG-Ambitions-Face-Reality-Check.html>.

risks. While MUFG may be anticipating that LNG would replace coal for baseload power generation in Asia, there is little evidence to suggest that the largest coal-consuming countries – that is, China¹² and India¹³ -- are using LNG as a substitute, due both to economic cost and policy incentives.¹⁴ In fact, as renewable energy skyrockets in both markets, power generation from gas and LNG has remained meager over the past decade.¹⁵

Litigation surrounding Saguaro LNG and associated pipelines

In addition to the direct financial and logistical hurdles outlined above, **Mexico Pacific faces multiple lawsuits in connection with the Saguaro LNG Project, which will result in serious obstacles to construction of the LNG plant as well as construction of the pipelines** that would extend across the U.S.-Mexico border from the Permian Basin and serve as the lifeline for the planned LNG terminal.

- **Lawsuits challenging the Saguaro LNG Project:** There are currently five lawsuits pending in Mexican courts that directly pertain to Saguaro LNG and, due to the issuance of a preliminary injunction, are blocking the project from beginning construction while the lawsuits are pending.¹⁶ (*See attached Appendix for further details.*)
 - Lawsuit challenging the environmental permit: Mexican nonprofit Centro Mexicano para la Defensa del Medio Ambiente A.C. (“DAN”) and four other national and international organizations filed a constitutional lawsuit (*juicio de amparo*) on June 11, 2024, before a Federal Court in Mexico City, challenging the government’s decision to issue a permit for the project based on Mexico Pacific’s modified Environmental Impact Authorization from 2006 for constructing a regasification plant. Due to different and more significant impacts anticipated by

¹² IEEFA, *Fact Sheet: LNG is not a “bridge fuel” in China’s transition from coal to renewables* (June 25 2024), <https://ieefa.org/resources/fact-sheet-lng-not-bridge-fuel-chinas-transition-coal-renewables> (<https://perma.cc/GYH8-DVKP>)

¹³ Ember, *India overtook Germany to become the world’s third largest generator of electricity from wind and solar in 2024* (April 10, 2025), <https://ember-energy.org/countries-and-regions/india/> (<https://perma.cc/Z8MF-HF87/>)

¹⁴ IEEFA, *Shell’s latest LNG outlook underestimates barriers to demand growth in Asia* (February 20, 2024), <https://ieefa.org/resources/shells-latest-lng-outlook-underestimates-barriers-demand-growth-asia> (<https://perma.cc/EE9V-5QWK>)

¹⁵ IEEFA, *LNG is not displacing coal in China’s power mix* (June 25, 2024), <https://ieefa.org/resources/lng-not-displacing-coal-chinas-power-mix> (<https://perma.cc/B6MZ-XRKS>)

¹⁶ The preliminary injunction was granted in file No. 408/2024. See *EnergiaDebate, Proyecto Saguaro de GNL tiene cinco juicios de amparo en su contra: ASEA* (February 28, 2025), <https://energiaadebate.com/proyecto-saguaro-de-gnl-tiene-cinco-juicios-de-amparo-en-su-contra-asea/> (<https://perma.cc/CJ92-RH5R>). We note that all suits have been assigned to the same judge of the 14th District Court of the 5th Circuit in Hermosillo, Sonora, and are awaiting the resolution of certain procedural issues before issuing a ruling of law that will apply uniformly to each of the matters in question. This does not imply that each suit will have the same outcome, but instead will ensure that the interpretation of relevant laws will be consistent across each of the individual judicial resolutions.

the now planned liquefaction plant, the lawsuit calls for a new Environmental Impact Statement and associated legal processes, including public consultation.

- **Other constitutional lawsuits:** Four separate lawsuits have been filed by property owners seeking protection of the human rights explicitly guaranteed by the Mexican Constitution or by applicable international treaties. The lawsuits challenge the actions or omissions taken by the government concerning potential human rights violations.
- **Lawsuit challenging Mexico Pacific’s Sierra Madre (Frontera-Puerto Libertad) pipeline:** In March, several environmental organizations filed a constitutional lawsuit challenging the pipeline in Mexico that would directly supply the Saguaro LNG project. The lawsuit alleges environmental human rights breaches resulting from violations in the environmental impact evaluation process and authorization. (*See attached Appendix for further details.*)
- **Lawsuit challenging the Saguaro Connector Pipeline:** The Saguaro LNG project also faces uncertainty due to a lawsuit brought in U.S. federal court challenging federal government approval of the U.S. portion of the connector pipeline. On June 13, 2024, Sierra Club and Public Citizen sued the Federal Energy Regulatory Commission (“FERC”) for its approval of ONEOK’s Saguaro Connector Pipeline. The lawsuit contends that FERC’s Authorization Order and the Environmental Assessment on which it was based violated the National Environmental Policy Act (“NEPA”), the Natural Gas Act (“NGA”), and the Administrative Procedure Act (“APA”)¹⁷ on the grounds that FERC improperly limited its statutorily required NEPA review and NGA public interest review to only 1,000 feet of the pipeline at the U.S.-Mexican border, when the law requires a review of the entire 157 miles of the pipeline in the U.S.¹⁸ The lawsuit takes issue with FERC’s failure to account for the negative impacts of the pipeline on consumer gas prices, communities, and on climate and water quality, including the significant risk of rupture due to seismic activity and local hydrological features.¹⁹ A hearing was held on April 17, 2025 and a decision has not yet been issued.²⁰

¹⁷ *Id.*

¹⁸ Sierra Club, *Sierra Club, Public Citizen Sue FERC for Flawed Approval of Texas Gas Pipeline to Mexico* (June 13, 2024), <https://www.sierraclub.org/press-releases/2025/03/sierra-club-public-citizen-sue-ferc-flawed-approval-texas-gas-pipeline> (<https://perma.cc/MHC2-ND8G>).

¹⁹ See Petition for Review, *Sierra Club and Public Citizen v. FERC*, No. 24-1199 (D.C. Cir. June 13, 2024), <https://www.sierraclub.org/sites/default/files/2024-06/Saguaro%20Petition%20for%20Review%20-%20filed.pdf> (<https://perma.cc/5SDU-F83X>).

²⁰ See Brief of Respondent, *Sierra Club and Public Citizen v. FERC*, No. 24-1199 (D.C. Cir. February 25, 2025), <https://www.ferc.gov/enforcement-legal/legal/court-cases/sierra-club-and-public-citizen-v-ferc-1>.

REPUTATIONAL RISKS FOR MUFG

As the lawsuits proceed in court, the reputational risk associated with this project continues to worsen, with intensifying opposition from civil society actors as well as local communities based on its anticipated environmental impacts and potential human rights violations. Over 30 civil society groups have protested this LNG project's impact on the Gulf of California's biodiversity, and community opposition has expanded to encompass impacts from the pipeline.²¹ The reputational risk that derive from the potential adverse impacts of the project as well as inconsistencies with MUFG's policies could give rise to legal risks, as detailed below.

Human Rights

In relation to the granting of Environmental Impact Assessments and Authorizations for development projects, Mexican law recognizes its citizens' human right to a healthy environment and the mandate for authorities to guarantee the population a healthy environment for their development and well-being.²² Mexican courts have recognized public participation as one of the guiding principles of environmental law,²³ and have confirmed that the right of Mexican citizens to public participation and access to environmental information in any decision-making process that could affect their right to a healthy environment confers various obligations on the state, including conducting consultations from the initial stages of the process and allowing timely, clear, and understandable access to information.²⁴ The Mexican Constitution also recognizes the rights of affected Indigenous communities to be consulted before proceeding with the project, or to obtain their consent in the case of projects

²¹ Private Equity Stakeholder Project, *PE-Backed LNG Project Marred With Setbacks and Community Opposition* (November 21, 2024), <https://pestakeholder.org/news/pe-backed-lng-project-marred-with-setbacks-and-community-opposition/> (<https://perma.cc/U89Q-UFSP>)

²² Second Chamber of the Supreme Court of Justice of the Nation, Isolated Thesis 2a. XVI/2020 (10a.) "PUBLIC PARTICIPATION AND CONSULTATION. THE STATE MUST GUARANTEE THIS RIGHT IN PROJECTS OR ACTIVITIES THAT MAY CAUSE AN IMPACT ON THE ENVIRONMENT. (September 25, 2020) <https://sjf2.scjn.gob.mx/detalle/tesis/2022147>. See also Supreme Court of Justice of the Nation, Press Release No. 035/2022, "THE FIRST CHAMBER GRANTS AN AMPARO RELATED TO THE EXPANSION WORKS OF THE PORT OF VERACRUZ, IN ORDER TO GUARANTEE THE RIGHT TO A HEALTHY ENVIRONMENT" (February 9 2022) <https://www.internet2.scjn.gob.mx/red2/comunicados/noticia.asp?id=6755> (<https://perma.cc/R6QU-ZRAT>).

²³ First Chamber of the Supreme Court of Justice of the Nation, Amparo en Revisión 307/2016 (November 14, 2018), at 113 (noting "the duty of all authorities, within their respective spheres of competence, to foster citizen participation and ensure an enabling environment for environmental protection is emphasized") <https://www2.scjn.gob.mx/ConsultasTematica/Detalle/195934>.

²⁴ Supreme Court of Justice of the Nation, First Chamber, Jurisprudence Thesis 1a./J. 3/2024 (11a.) "RIGHT TO CITIZEN PARTICIPATION AND ACCESS TO ENVIRONMENTAL INFORMATION IN ENVIRONMENTAL MATTERS. MINIMUM OBLIGATIONS THAT THE STATE MUST MEET TO GUARANTEE ITS ESSENTIAL CORE IN A DECISION-MAKING PROCESS." (January 10 2024), <https://sjf2.scjn.gob.mx/detalle/tesis/2028013>.

that have a “high degree of impact.”²⁵ Failure to comply with this requirement has severely disrupted previous pipeline projects, such as the Tula-Tuxpan pipeline, which was delayed over six years due to opposition.²⁶

We note that MUFG has explicitly committed to “engage[] in human rights due diligence by respecting the United Nations Guiding Principles on Business and Human Rights and the OECD Due Diligence Guidance for Responsible Business Conduct,” and it will not provide financing “when the client’s environmental and social consideration for the potential risks or impacts is not [sufficient].”²⁷ We further note and applaud MUFG’s policy that “if MUFG has been directly linked to adverse impacts through business relationships, MUFG will appropriately use our leverage to encourage our clients, suppliers, and others to prevent or mitigate such adverse impacts.”²⁸

The risk of this project to human rights, as exemplified by the lawsuits and community opposition, should trigger MUFG’s policy to use its leverage to prevent or mitigate these potential adverse impacts that may be directly linked to MUFG’s services.²⁹

Biodiversity

With respect to biodiversity, we understand that MUFG prohibits transactions that “violate public order and good morals” or “negatively impact UNESCO designated World Heritage Sites,” and that MUFG is committed to conducting “enhanced due diligence” in connection with any transactions that have an “impact on high conservation value areas.”³⁰ While recognizing MUFG’s current relationship with Mexico Pacific to be in an advisory role, we note that any

²⁵ Art. 2 Sec. XIII of the Mexican Constitution. See also *Jurisprudencia, Human Right to Consultation of Indigenous Peoples and Communities. It is Required Prior to the Issuance of Environmental Assessments and Authorizations Related to Projects or Works that May Impact Their Environment or Way of Life*, at 28 (March 3, 2023); *Jurisprudencia, Right to Prior Consultation. The Duty to Carry It Out Is Updated in the Face of the Mere Possibility That the State Decision Affects Indigenous Peoples and Communities in a Direct or Differentiated Manner, Without It Being Required to Prove the Damage and Its Significant Impact*, at 26 (March 3, 2023). Both were issued by the Second Chamber of the Mexican Supreme Court of Justice of the Nation: <https://www.gazhal.com.mx/pdf/scjn/2023/20230303.pdf> (<https://perma.cc/P96M-7SQQ>).

²⁶ Argus, *Mexico’s Sierra Madre Pipeline Faces Permit Hurdles* (February 14, 2025), <https://www.argusmedia.com/ja/news-and-insights/latest-market-news/2658365-mexico-s-sierra-madre-pipeline-faces-permit-hurdles> (<https://perma.cc/TFG9-FW7A>).

²⁷ MUFG, Human Rights Report 2024, at 20 and 31.

https://www.mufg.jp/dam/csr/report/humanrights/2024_en.pdf (<https://perma.cc/LM98-PZB7>) (The quoted language in the English report has been amended to match the language in the equivalent Japanese report)

²⁸ MUFG Human Rights Policy Statement, para. 5, <https://www.mufg.jp/english/csr/policy/index.html> (<https://perma.cc/XB4D-LRTZ>)

²⁹ UN Guiding Principles on Business and Human Rights, Principle 13(b), https://www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinessshr_en.pdf.

³⁰ *Id.*

decision to finance the company may raise serious questions of alignment with these prohibitions under your bank's policy. We further note that MUFG is a signatory to the Equator Principles³¹, and that these Principles apply to "Project Finance Advisory Services where total Project capital costs are US\$10 million or more."³² These Principles integrate the IFC Performance Standards, which stipulate specific and strict requirements for projects that impact critical or natural habitats, both of which are applicable here.³³ The Saguaro LNG project would be developed in one of the most environmentally sensitive and well-known areas of biodiversity anywhere on Earth, and its impacts would be devastating. The Gulf of California, famously named by legendary oceanographer Jacques Cousteau the "Aquarium of the World," is recognized as an area of global conservation significance for its rich diversity and abundance of marine and terrestrial species. The Islands and Protected Areas of the Gulf of California is a World Heritage Site designated by UNESCO in 2005.³⁴ Parts of the Gulf of California were designated by Mexico as a Biosphere Reserve in 1993,³⁵ as a Migratory Bird Refuge in 1978,³⁶ and, on numerous occasions, as Ramsar Convention wetlands of international importance.³⁷ It is also designated as an Important Marine Mammal Area (IMMA).³⁸

In addition to the ecological impacts from the development of liquefaction facilities, ports, and hundreds of miles of pipelines, the consequences of using the uniquely biodiverse Gulf as a shipping channel for LNG cannot be meaningfully mitigated. LNG transport through the narrow confines of the Gulf would put at risk multiple species of great whales (including the world's two largest, the endangered blue and fin whales) and numerous other marine animals found in the region.³⁹ During the decades-long life-span of the Saguaro project, transit through the Gulf of massive LNG vessels, each hundreds of meters in length, would inevitably result in ship strikes,⁴⁰

³¹ MUFG, The Equator Principles, <https://www.mufg.jp/english/csr/environment/equator/index.html>.

³² Equator Principles Ver. 4 (July 2020), at 5. https://equator-principles.com/app/uploads/The-Equator-Principles_EP4_July2020.pdf.

³³ IFC Performance Standards – Performance Standard 6 (January 1, 2012), <https://www.ifc.org/content/dam/ifc/doc/2010/2012-ifc-performance-standards-en.pdf>.

³⁴ UNESCO World Heritage Convention, Islands and Protected Areas of the Gulf of California, <https://whc.unesco.org/en/list/1182> (<https://perma.cc/NW35-JNJP>)

³⁵ UNESCO Man and the Biosphere Programme (MAB), Alto Golfo de California y El Pincate, <https://www.unesco.org/en/mab/alto-golfo-de-california-y-el-pincate> (<https://perma.cc/7GPS-W2EN>)

³⁶ World Heritage Datasheet, Islands & Protected Areas of The Gulf of California, <http://world-heritage-datasheets.unep-wcmc.org/datasheet/output/site/islands-protected-areas-of-the-gulf-of-california/> (<https://perma.cc/U3MW-7FCZ>)

³⁷ The List of Wetlands of International Importance (May 9, 2023), at 32-24, <https://www.ramsar.org/sites/default/files/documents/library/sitelist.pdf> (<https://perma.cc/Z3BZ-EYHP>)

³⁸ Gulf of California IMMA - Marine Mammal Protected Areas Task Force, <https://www.marinemammalhabitat.org/factsheets/gulf-of-california-imma/> (<https://perma.cc/X5J5-RPF8>).

³⁹ *Id.* (recognizing that this area is home to California sea lions and Guadalupe fur seals, as well as 31 species of aquatic mammals)

⁴⁰ A.C. Nisi et al, *Ship collision risk threatens whales across the world's oceans*. Science, Vol. 386, Issu 6724, 21 November 2024, at 870-875 <https://www.science.org/doi/10.1126/science.adp1950>

ballast water pollution risks (including the introduction of invasive species),⁴¹ and a significant elevation of ambient ocean noise levels in a key habitat of marine animals whose survival (*e.g.*, communication, feeding, finding mates, reproducing, etc.) depends on hearing and being heard.⁴² Simply stated, endangered whales and other marine life of concern will likely face increased mortality and stress as a result of ship strikes, underwater noise, and destruction of key habitats caused by LNG construction and shipping traffic.

The Saguaro project is also inconsistent with Mexico's protected area designations for the Gulf and, more broadly, with Mexico's rich history of support for whale and marine conservation, both domestically and internationally. A generation ago, for example, Mexican President Ernesto Zedillo made headlines globally when he abandoned a joint venture with Mitsubishi Corporation to build the world's largest industrial salt production facility around the last undisturbed breeding lagoon of the Pacific gray whale, in the World Heritage Site at El Vizcaino Biosphere Reserve on the Pacific coast of Baja California.⁴³ In 2012, President Felipe Calderón cancelled permits for the proposed Cabo Cortez mega-resort project adjacent to Cabo Pulmo National Park along the southwestern coast of the Gulf, citing unacceptable risk to its sensitive coral reef and the biodiversity of its surrounding marine ecosystem.⁴⁴

Specifically with respect to the Saguaro LNG Project, concerns about risks to the sensitive ecosystem of the Gulf of California have also been confirmed by the International Union for the Conservation of Nature ("IUCN")⁴⁵ and marine mammal scientists from the Marine Mammal Research Program ("PRIMMA") of the Autonomous University of Baja California Sur.⁴⁶

⁴¹ K.K. Holzer et al, *Potential effects of LNG trade shift on transfer of ballast water and biota by ships*, Science of The Total Environment, Vol. 580, 15 February 2017, at 1470-1474, <https://www.sciencedirect.com/science/article/abs/pii/S0048969716328169>.

⁴² NRDC, Sonic Sea, <https://www.nrdc.org/sonicsea>

⁴³ L.A. Times, Saltworks Vetoed to Protect Whales / Mexico chooses ecotourism over industry in Baja California lagoon (March 3, 2020), <https://www.sfgate.com/green/article/saltworks-vetoed-to-protect-whales-mexico-2798791.php>

⁴⁴ L.A. Times, Mexico cancels mega-resort project near Baja California reef (June 15, 2012), <https://www.latimes.com/archives/blogs/world-now/story/2012-06-15/mexico-cancels-mega-resort-project-near-baja-california-reef> (<https://perma.cc/ST3S-YSCA>)

⁴⁵ Species Survival Commission (SSC) and the World Commission on Protected Areas (WCPA) of the IUCN, IUCN Concern and Offer of Expertise Regarding LNG Development on the Sonora Coast (November 29, 2024), <https://iucn-csg.org/wp-content/uploads/2024/12/2024-11-29-Carta-CSE-CMAP-proyecto-Saguaro-GLN-Mexico-ENG.pdf> (perma.cc/V2TR-YBEZ)

⁴⁶ "Impacto del Proyecto Saguaro Energia GNL a los cetaceos del Golfo de California," Urban et al. (January 2025), available at <https://drive.google.com/drive/folders/1z7rAw2PCQ4Jm4nOA9RGD4unwin0kdalF> (<https://perma.cc/2MQQ-UVZU>); Saguaro project to cause whale die-offs in Gulf of California, study warns, Peninsular Digital (January 29, 2025), <https://peninsulardigital.com/2025/01/29/proyecto-saguaro-causara-mortandad-de-ballas-en-golfo-de-california-advier-te-studio/> (<https://perma.cc/B5E5-NH3Y>); Proyecto

MUFG’s assistance as Financial Advisor on the Saguaro LNG project would unquestionably enable, contribute to, or increase the likelihood of the project’s detrimental impacts on the ecological health of the Gulf of California, thereby threatening the integrity of the very biodiversity that motivated its designation by UNESCO. MUFG’s support for this project is therefore inconsistent with its adoption of the Equator Principles and commitment to sustainable development at large, and further involvement will likely violate MUFG’s policy prohibiting transactions that would negatively impact UNESCO-designated World Heritage Sites.

Climate Change

We further note that the climate impacts associated with construction of Saguaro LNG are also inconsistent with the climate commitments and recognition of climate-related financial risks that MUFG has communicated to investors and to consumers.

We recognize and applaud MUFG for its commitment to net zero emissions.⁴⁷ It is in light of this that we alert you to the significant lifecycle emissions associated with Saguaro LNG, particularly resulting from methane. The Saguaro LNG terminal itself is estimated to emit at least 5.7 million metric tons of CO₂ equivalent (MTCO₂e) annually.⁴⁸ Its lifecycle impact is much larger: according to a life cycle analysis prepared by Iniciativa Climática de México (“ICM”), a non-profit research organization specializing in energy transition in Mexico, the first phase of Saguaro would generate 73 MTCO₂e per year and 1460 MTCO₂e over a 20-year lifespan – equivalent to 17.4 million additional vehicles per year.⁴⁹

Contrary to assertions by the gas industry, LNG exports from the U.S. cannot be characterized as a bridge fuel and are inconsistent with the global energy transition necessary to stabilize the

Saguaro sería principal causa de muerte en ballenas del Golfo de California (January 28, 2025), <https://www.msn.com/es-mx/noticias/mexico/proyecto-saguaro-ser%C3%ADa-principal-causa-de-muerte-en-ballenas-del-golfo-de-california/ar-AA1y1UX2> (<https://perma.cc/HL4Y-C4AU>)

⁴⁷ MUFG Carbon Neutrality Declaration, <https://www.muftg.jp/english/csr/environment/cnd/index.html> (<https://perma.cc/FX7N-QRND>)

⁴⁸ Emissions calculations were based on an average of five emissions factors of the LNG liquefaction process from the 2020 NRDC study on lifecycle emissions of LNG. See NRDC, *Sailing to Nowhere: Liquefied Natural Gas is Not an Effective Climate Strategy* (December 8, 2020), <https://www.nrdc.org/resources/sailing-nowhere-liquefied-natural-gas-not-effective-climate-strategy>. Other emissions considerations that can be associated with LNG but were not included in this analysis include upstream extraction, pipeline transport, tanker transport, regasification, and ultimate end uses.

⁴⁹ Iniciativa Climática de Mexico, Lifecycle GHG emissions analysis of the Saguaro Energy LNG export project (November 2024), <https://www.iniciativaclimatica.org/analisis-de-emisiones-de-gei-de-ciclo-de-vida-del-proyecto-de-exportacion-de-gnl-saguaro-energia/> (<https://perma.cc/RA5E-VPNX>)

climate.⁵⁰ The Saguaro project would result in significant contributions of greenhouse gas emissions, further aggravating the escalating global climate crisis,⁵¹ at a time when – according to the International Energy Agency’s World Energy Outlook in 2023 – global LNG markets are headed toward a “glut of LNG.”⁵² The immense climate impacts associated with U.S. LNG exports are clearly recognized in the U.S. Department of Energy’s study on LNG exports released in December 2024,⁵³ based on which then-Energy Secretary Jennifer Granholm stated: “[S]pecial scrutiny needs to be applied toward very large LNG projects. An LNG project exporting 4 billion cubic feet per day – considering its direct life cycle emissions – would yield more annual greenhouse gas emissions by itself than 141 of the world’s countries each did in 2023.”⁵⁴ For comparison, the Saguaro LNG terminal would export approximately 4.0 billion cubic feet per day when fully built.⁵⁵

A significant factor in the LNG climate footprint is the serious problem of intended and unintended methane emissions from flaring and venting as well as leakage, which studies have identified as a persistent challenge across segments of the natural gas industry, particularly in the Permian Basin⁵⁶ where Saguaro LNG’s gas will be sourced. Peer reviewed scientific studies have found that “upstream and midstream methane emissions are the largest

⁵⁰ Robert W. Howarth, *The Greenhouse Gas Footprint of Liquefied Natural Gas (LNG) Exported From the United States*, Energy Science & Engineering, at 4843-4859 (October 3, 2024), [doi:10.1002/ese3.1934](https://doi.org/10.1002/ese3.1934). See also *Is LNG Worse Than Coal? The economic, climate and safety risks of LNG as part of the energy transition*, World Economic Forum, Davos, Switzerland (January 20, 2025) <https://sdgtent.com/events/is-lng-worse-than-coal/>; IEEFA, World Economic Forum sessions highlight LNG’s economic, energy security, and climate risks (January 31, 2025), <https://ieefa.org/articles/world-economic-forum-sessions-highlight-lngs-economic-energy-security-and-climate-risks> (<https://perma.cc/2WUC-TQJ5>).

⁵¹ ‘Climate bomb’ warning over \$200bn wave of new gas projects, The Guardian (December 5, 2024), <https://www.theguardian.com/environment/2024/dec/05/climate-bomb-warning-over-200bn-wave-of-new-gas-projects> (<https://perma.cc/858N-BC28>).

⁵² International Energy Agency, World Energy Outlook 2023: Executive Summary, <https://www.iea.org/reports/world-energy-outlook-2023/executive-summary> (<https://perma.cc/K5DD-KCU7>).

⁵³ US Department of Energy, *2024 LNG Export Study: Energy, Economic, and Environmental Assessment of U.S. LNG Exports* (December 2024), https://www.energy.gov/sites/default/files/2024-12/LNGUpdate_SummaryReport_Dec2024_230pm.pdf (<https://perma.cc/KZ9K-U26U>).

⁵⁴ US Department of Energy, *Statement from U.S. Secretary of Energy Jennifer M. Granholm on Updated Final Analyses* (December 17, 2024), https://www.energy.gov/sites/default/files/2024-12/Statement%20from%20U.S.%20Secretary%20of%20Energy%20Jennifer%20M.%20Granholm%20on%20Updated%20Final%20Analyses_12.17.2024.pdf.

⁵⁵ This number has been calculated on the basis that Mexico Pacific plans to export 30 MMTPA at full build out. Mexico Pacific, Saguaro Energía, <https://mexicopacific.com/saguaro-energia/> (<https://perma.cc/QX8S-C8W6>). The calculation uses an equivalence of 1 MMTPA (LNG) = 48.7 billion cubic feet (Bcf)/year. https://www.enerdynamics.com/Energy-Currents_Blog/Understanding-Liquefied-Natural-Gas-LNG-Units.aspx. Mexico Pacific’s anticipated 30 MMTPA of LNG * 48.7 Bcf/year = 1,461 Bcf/year. This is equivalent to = 4.0027 Bcf/day.

⁵⁶ Environmental Defense Fund, *Permian Methane Analysis Project (PermianMAP)*, <https://www.permianmap.org/> (<https://perma.cc/EA92-LJRS>).

contributor to the LNG footprint” and “overall, the greenhouse gas footprint for LNG as a fuel source is 33% greater than that for coal when analyzed using [Global Warming Potential over 20 years].”⁵⁷ Given the Trump Administration’s decision to roll back regulations to address methane emissions,⁵⁸ and the broader efforts and plans by the federal government to discontinue or scale back regulation of climate or environmental impacts,⁵⁹ any expectation of more carefully monitored natural gas production in the U.S. is highly uncertain. Methane is a potent greenhouse gas, trapping 83 times more heat than CO₂ over a 20-year timeframe.⁶⁰ The EPA had estimated that its methane rules would prevent 1.2 million metric tons of methane emissions.⁶¹ There can be no reasonable expectation for those reductions now.

Unfortunately, the rollback of these climate-related regulations in the U.S. will only serve to increase the systemic climate-related financial risks that MUFG and other financial institutions acknowledge and purport to incorporate into their decision-making and disclosures. Providing advisory or direct financial support to fossil fuel expanders such as Mexico Pacific contributes to greater long-term financial risks by necessitating a more disorderly transition to net zero⁶² and exacerbating climate-related physical risks that will disrupt normal business operations, burden government resources, and potentially lead to significant impacts on real estate lending portfolios.⁶³ The risk of widespread devaluations and the stranding of carbon-intensive assets,

⁵⁷ Howarth, *supra* n. 50.

⁵⁸ New York Times, *A Straightforward Climate Fix Hits Another Setback* (March 4, 2025), <https://www.nytimes.com/2025/03/04/climate/methane-climate-change.html>; Politico, *Trump Signs Resolutions to Undo Methane Fee, Offshore Drilling Rules* (March 17, 2025), <https://www.eenews.net/articles/trump-signs-resolutions-to-undo-methane-fee-offshore-drilling-rules-2/> (<https://perma.cc/Y2Z4-LGX5/>); US Environmental Protection Agency, *Waste Emissions Charge*, <https://www.epa.gov/inflation-reduction-act/waste-emissions-charge> (<https://perma.cc/BUJ5-HMVF>) (accessed March 23 2025).

⁵⁹ Columbia Law School, *Climate Backtracker*, <https://climate.law.columbia.edu/content/climate-backtracker> (<https://perma.cc/6PT5-XVY7>).

⁶⁰ Forster, P., T. Storelvmo, K. Armour, W. Collins, J.-L. Dufresne, D. Frame, D.J. Lunt, T. Mauritsen, M.D. Palmer, M. Watanabe, M. Wild, and H. Zhang, 2021: Chapter 7: The Earth’s Energy Budget, Climate Feedbacks, and Climate Sensitivity, at 1017. In IPCC, 2021: *Climate Change 2021: The Physical Science Basis*. Contribution of Working Group I to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change, <https://www.ipcc.ch/report/ar6/wg1/> (<https://perma.cc/WRL9-EZQW/>). See also European Commission, *Methane Emissions*, https://energy.ec.europa.eu/topics/carbon-management-and-fossil-fuels/methane-emissions_en (<https://perma.cc/N3P9-BTC6>).

⁶¹ US Environmental Protection Agency, *EPA Finalizes Rule to Reduce Wasteful Methane Emissions and Drive Innovation in the Oil and Gas Sector* (November 12, 2024), <https://www.epa.gov/newsreleases/epa-finalizes-rule-reduce-wasteful-methane-emissions-and-drive-innovation-oil-and-gas> (<https://perma.cc/B8YR-DJT4>).

⁶² Transition risks resulting, for example, from policy responses to climate change, technological innovations or a changed business environment resulting from evolving stakeholders perceptions and expectations.

⁶³ See, e.g. First Street, *11th National Risk Assessment: Portfolio Pressures* (September 2024), <https://firststreet.org/research-library/portfolio-pressures> (<https://perma.cc/C37N-ENEV>). See also AIGCC, *Climate Damage and Physical Impacts Likely to Wipe Out USD 9.2 trillion from Japan’s Economy if Current Global Policy Trajectories Continue* (December 17 2024), <https://aigcc.net/climate-damage-and-physical-impacts-likely-to-wipe-out-usd-9-2-trillion-from-japans-economy-if-current-global-policy-trajectories-continue/> (<https://perma.cc/AH2F-A7F8>).

particularly fossil fuel assets,⁶⁴ is widely recognized as a potential threat to global financial stability. If these risks materialize, they could wipe out trillions of dollars in asset value⁶⁵ and significantly disrupt financial and price stability.⁶⁶ Such impacts have the potential to trigger the next systemic financial crisis.⁶⁷

In light of current science, we believe that the multi-decade investment in fossil fuel infrastructure required by the Saguaro project is irreconcilable with the urgency of our climate crisis and the achievement of international goals for greenhouse gas emission reductions that are essential to address it.⁶⁸ Saguaro is therefore neither needed nor compatible with a net-zero energy scenario.

LEGAL RISKS FOR MUFG

In light of these facts, MUFG's advisory role with respect to Mexico Pacific's Saguaro LNG Project is difficult to reconcile with MUFG's stated environmental and social commitments on climate, biodiversity, and human rights. If left unaddressed, these contradictions could potentially expose your company to legal risks such as greenwashing claims by consumers in the U.S.⁶⁹ or Japan⁷⁰; or claims by investors of material misrepresentation to investors under U.S. federal⁷¹ or

⁶⁴ See Daniel Chester et al, *Stranded Human and Produced Capital in a Net-Zero Transition*, Environmental Research: Climate (September 30, 2024). DOI: 10.1088/2752-5295/ad7313, <https://iopscience.iop.org/article/10.1088/2752-5295/ad7313>.

⁶⁵ See, e.g., UK Sustainable Investment and Finance Association, *Stranding: Modelling the UK's Exposure to At-Risk Fossil Fuel Assets* (March 2025), [UKSIF-Stranded-Assets-Report-March-2025.pdf](#) (noting total global losses from asset stranding likely to reach \$2.28 trillion by 2040).

⁶⁶ See Mark Carney, *Resolving the Climate Paradox* (September 2016), <https://www.bis.org/review/r160926h.pdf> (<https://perma.cc/KWZ7-VT6T>).

⁶⁷ Bank for International Settlements and Banque de France, *The Green Swan: Central Banking and Financial Stability in the Age of Climate Change*, at 19 (January 2020), <https://www.bis.org/publ/othp31.pdf> (<https://perma.cc/B4BB-YG4Z>). See also Bank of Japan, *The Bank of Japan's Strategy on Climate Change* (July 16, 2021), https://www.boj.or.jp/en/about/release_2021/rel210716b.pdf (<https://perma.cc/4CEL-V7H6>).

⁶⁸ See *supra* n. 50.

⁶⁹ See, e.g., N.Y. General Business Law § 349 and § 350 (forbidding deceptive business acts or practices and false advertising that is consumer-oriented and materially misleading) and *People v. JBS USA Food Co.*, No. 450682/2024 (N.Y. Sup. Ct. February 28, 2024), <https://ag.ny.gov/sites/default/files/court-filings/jbs-complaint.pdf> (<https://perma.cc/FFG2-26FC>). See also Center for Climate Integrity, *Big Oil Accountability Lawsuits*, <https://climateintegrity.org/lawsuits> (<https://perma.cc/H3G2-MW6Z>).

⁷⁰ See, e.g., ClientEarth and AIGCC, *Greenwashing and how to avoid it: An introductory guide for Asia's finance industry* (Japan edition) (October 2023), at 15, <https://www.clientearth.asia/resources/documents/japan-edition-of-greenwashing-guide-released/> (<https://perma.cc/6QH4-ZBBL>). See also Kiko Network, Press Release: Sharing information with the UN regarding the petitions submitted to JARO on JERA's "CO2-free fire" and other greenwash advertisements (August 15, 2024), <https://kikonet.org/en/content/36192> (<https://perma.cc/J9C6-9JDY>).

⁷¹ Securities Exchange Act of 1934 Section 10(b) (15 U.S.C. § 78j(b)) and Rule 10b-5 promulgated thereunder (17 C.F.R. § 240.10b-5). See, e.g., *Ramirez v. Exxon Mobil Corp.*, 334 F. Supp. 3d 832 (N.D. Tex. 2018).

U.S. state securities laws⁷² or, potentially, under Japanese laws.⁷³ Losses suffered by MUFG or its shareholders due to involvement in this project could also be construed as a failure to properly manage financial or reputational risks to the company and trigger potential violations of fiduciary duty by MUFG's board of directors under the Companies Act of Japan.⁷⁴

These risks are not theoretical. Multiple banks have already been the subject of litigation and/or regulatory investigations regarding the disconnect between their climate-related consumer advertising or public disclosures and their fossil fuel financing activities.⁷⁵ The Network for Greening the Financial System ("NGFS"), an association of 144 central banks and prudential authorities, has noted and predicted a strengthening of this trend,⁷⁶ particularly as laws governing prospectuses are acknowledged to present a relatively low bar for legal claims.⁷⁷ Even short of risks of greenwashing and misrepresentation, MUFG is increasing its reputational risk dramatically by associating with this widely controversial project.

CONCLUSION

In summary, the Mexico Pacific Saguaro LNG project poses the following risks that must be taken into account:

- **Harm to biodiversity:** The Saguaro LNG project threatens the globally significant Gulf of California, a UNESCO World Heritage Site, with the potential for irreversible damage to marine ecosystems and endangered species.

⁷² See, e.g., N.Y. General Business Law § 352 et seq.

⁷³ Financial Instruments and Exchange Act, Article 21-1, Paragraph 1 and Article 25, Paragraph 1, Item 3 (Liability for Damages of Person Who Submitted Annual Securities Report Containing False Statement, etc.), available at <https://www.fsa.go.jp/en/policy/fiel/> (<https://perma.cc/R9ZH-7VQ7>).

⁷⁴ See Commonwealth Climate and Law Initiative, Directors' Duties Regarding Climate Change in Japan: 2025 (March 2025), at 26-35.

⁷⁵ ClientEarth and AIGCC, *Greenwashing and How to Avoid It: An Introductory Guide for Asia's Finance Industry: Japan Edition*, at 17-20 (October 2023), <https://www.clientearth.asia/media/tdyoq2ts/japan-edition-greenwashing-and-how-to-avoid-it.pdf> (<https://perma.cc/FL4Y-CWXW>). See also Mark Kalegha, *The Royal Bank of Canada's Climate Policy Has Come Under Close Scrutiny From Its Stakeholders*, Institute for Energy Economics and Financial Analysis (October 5, 2023), <https://ieefa.org/resources/royal-bank-canadas-climate-policy-has-come-under-close-scrutiny-its-stakeholders> (<https://perma.cc/YVZ6-ZD5K>); and *Abrahams v Commonwealth Bank of Australia* (CBA) NSD864/2021 (granting access to Board documents related to the financing of oil and gas projects), <https://equitygenerationlawyers.com/case/abrahams-v-commonwealth-bank-of-australia-2021/> (<https://perma.cc/YY58-KFAR>).

⁷⁶ See Network for Greening the Financial System (NGFS), *Climate-Related Litigation: Recent Trends and Developments*, at 13 (September 2023), https://www.ngfs.net/system/files/import/ngfs/medias/documents/ngfs_report-on-climate-related-litigation-recent-trends-and-developments.pdf (<https://perma.cc/E3AD-TA9N>); *Milieudefensie v. ING Bank* (2024), <https://climatecasechart.com/non-us-case/milieudefensie-v-ing-bank/> (<https://perma.cc/9Q8E-WKX6>).

⁷⁷ See NGFS, *Report on Micro-Prudential Supervision of Climate-Related Litigation Risks*, at 9 (September 2023), https://www.ngfs.net/system/files/import/ngfs/medias/documents/ngfs_report-on-microprudential-supervision-of-climate-related-litigation-risks.pdf (<https://perma.cc/2SGD-2HZ7>).

- **Net zero incompatibility:** With substantial lifecycle emissions, the Saguaro LNG project undermines MUFG's net-zero commitments and exposes it to climate-related financial risks amid weakening regulatory safeguards in the U.S.
- **Human rights violations:** The Saguaro LNG project is currently stalled due to several legal challenges brought by affected communities on the basis of violating human rights.
- **Financial risks:** Uncertainty and delays caused by the lawsuits are compounded by operational difficulties and LNG market risks, increasing the financial risks associated with the project.
- **Misalignment with MUFG policies:** Current advisory services and potential future financing of Saguaro LNG contradict MUFG's stated commitments on sustainability, human rights, and responsible business conduct.

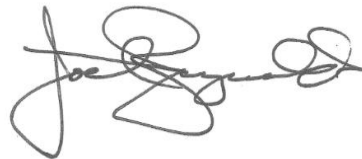
In light of these risks, we therefore urge MUFG to reconsider any further involvement in the Saguaro Energia LNG Project, and to decline any further support for Mexico Pacific's environmentally unsound practices. This should not be understood as a request for MUFG to breach any existing legal or contractual obligations, but rather as an invitation to take the first possible opportunity to reassess and reconsider its involvement in this project going forward.

Should you have any questions on this matter, we would welcome an opportunity to discuss it further.

Sincerely,



Jay Rossiter
Acting Director
ClientEarth USA



Joel Reynolds
Senior Attorney
Natural Resources Defense Council

Cc: Hana Heineken, Attorney, ClientEarth USA
Sujatha Bergen, Director, Global Energy Transition, NRDC

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Table Summarizing the Lawsuits against Saguaro Energía LNG Project and STGN Sierra Madre (Frontera-Puerto Libertad) pipeline.

File number	Plaintiff	Type of claim	Admission date	Summary of claims
1562/2023	Affected <i>ejidatario</i> ¹	Constitutional lawsuit (Amparo) ²	October 10, 2023	The plaintiff claimed that the following actions were unlawful: Official letter (number and date unspecified) of August 8, 2018, from the General Directorate of Industrial Process Management of the National Agency for Industrial Safety and Environmental Protection authorizing the change from a Liquid Natural Gas Regasification Terminal to a Natural Gas Liquefaction Terminal.
13/2024	Affected <i>ejidatario</i>	Constitutional lawsuit (Amparo)	January 17, 2024	The plaintiff claimed that the authorization for the modification to expand the LNG Terminal of Puerto Libertad Sonora granted by means of official letter ASEA/UGI/DGGPI/2183/2023 of September 14, 2023, was unlawful as it was granted without an Environmental Impact Statement (EIS).
408/2024	Affected <i>ejidatario</i>	Constitutional lawsuit (Amparo)	March 7, 2024	The plaintiff claimed that the authority acted unlawfully in its 1) failure to verify that the "Baseline Study for the Biotic Characterization of the Marine Environment in front of Puerto Libertad" and the "Environmental Monitoring Plan for Marine Noise" complied with the mitigation measures, in accordance with the first condition of the sixth term of the S.P.G.A./DGIRA.DDT.2277.06 letter authorized on 16 November, 2006; 2) failure to verify that the conditions established in the authorization of the EIS had been met; and 3) failure to supervise, inspect and monitor that the regulated party has started the construction work, without giving notice of the start of such activities, as provided in the eighth term of the aforementioned official letter.
1204/2024	Centro Mexicano para la Defensa del Medio Ambiente, A.C. (DAN) and others	Constitutional lawsuit (Amparo)	June 28, 2024	The plaintiff claimed that ASEA's ³ resolution to modify the 2006 Environmental Impact Authorization to change the project to one of liquefaction instead of regasification is unlawful as these are industrial activities with different environmental impacts. Hence the authority should have requested an EIS for it in order to follow due legal process, including by conducting a Public Consultation and a Public Hearing.
1285/2024	Unknown	Constitutional lawsuit (Amparo)	July 15, 2024	The plaintiff claimed that the following actions of the defendant authority were unlawful: 1) The omission to observe its own resolution dictated in the official letter of June 14, 2018. 2) Resolution (sic) issued on August 9, 2018, by means of official letter. 3) Resolution (sic) issued on September 14, 2023, in official letter.
645/2025	Environmental organizations	Constitutional lawsuit (Amparo)	March 31, 2025	The plaintiffs are claiming environmental human rights breaches resulting from violations in the environmental impact statement review process (omissions to grant effective public participation) and the subsequent environmental impact authorization to the STGN Sierra Madre (Frontera-Puerto Libertad) pipeline.

1 An *ejidatario* is a member of an *ejido*. In Mexico, an *ejido* is a group of individuals who have been granted (by the Federal Government) land to be used for agriculture and/or cattle raising. *Ejidatarios* have limited property rights over the land.

2 An *amparo* claim in Mexico is a judicial action that seeks the protection of the human rights explicitly guaranteed by the Mexican Constitution or by applicable international treaties. These claims can be filed only when there is an action or omission by a government agency which violates such human rights. *Amparos* are filed before and heard by Federal District Courts and Collegiate District Courts will hear the appeals.

3 Agencia de Seguridad, Energía y Ambiente (ASEA) [National Agency for Industrial Safety and Environmental Protection of the Hydrocarbons Sector].