



June 16, 2025

U.S. Department of Energy
David Taggart
Office of the General Counsel
GC-1, 1000 Independence Ave SW
Washington, DC 20585

Submitted via www.Regulations.Gov

Re: DOE-HQ-2025-0010: Opposition Comments to the Department of Energy's Direct Final Rule Amending the Administrative Procedures With Respect to the Import and Export of Natural Gas

The Center for Biological Diversity (“the Center”) submits this comment in strong opposition to the Department of Energy’s (“DOE” or “the Department”) Direct Final Rule amending Part 590 of Title 10, Code of Federal Regulations altering the regulations for the administrative procedures with respect to the import and export of natural gas. This regulatory rollback was issued without proper notice and comment.

The Center is a national, non-profit conservation organization with more than 1.7 million members and online activists who care about the country’s urgent need to expedite the renewable energy transition and protect human health, the natural environment, and species from impacts of climate change, the extinction crisis, and environmental degradation. The Center’s Energy Justice Program focuses on advancing energy justice and renewable energy deployment, including advocating for a just and equitable clean energy transition off of fossil fuels.

The Department is hereby placed on notice that this rule may be subject to legal challenge on the following grounds:

1. Inadequate Notice and Comment Process (APA, 5 U.S.C. § 553)

DOE’s use of a Direct Final Rule to implement this policy change improperly circumvents the standard notice-and-comment procedure mandated by the APA. Given the implications of these administrative changes, the DOE should have engaged in a full notice-and-comment process to allow stakeholders to provide input. The expedited nature of the rulemaking process raises concerns about the adequacy of public participation and exposes the rule to procedural challenge.

Conclusion and Request for Withdrawal

The Department of Energy's Direct Final Rule amending the regulations for the administrative procedures with respect to the import and export of natural gas is procedurally defective. On behalf of the Center for Biological Diversity, I respectfully urge DOE to withdraw the rule in its entirety.

Respectfully submitted,

Respectfully submitted,

/s/ Camden Weber

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