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March 25, 2025

Concerns regarding the role of JPMorgan Chase in Advising & Potentially Financing the Saguaro Energia LNG Project

Dear Mr. Dimon:

ClientEarth USA, Inc. is an independent 501(c)(3) public interest law firm that operates as part of a global ClientEarth network of entities, branches, representative offices, subsidiaries and partners headquartered in London. In addition to the U.S. entity, ClientEarth globally has offices across Europe and in Asia.

We write to you today to express serious concerns regarding your advisory role to Mexico Pacific¹ in constructing the Saguaro Energia Liquefied Natural Gas (LNG) Project, a new LNG terminal in a biodiversity hotspot that will both exacerbate the climate crisis and accelerate the loss of critical biodiversity habitat. This letter builds on the evidence and arguments presented by the Natural Resources Defense Council (NRDC) in the letter sent to you on February 7, 2025,² and focuses on the financial and reputational risks of associating with this LNG project.

Business Risks

Mexico Pacific is currently burdened by significant risks to its business activities, which are highly likely to cause disruptions and delays to its project development plans and thereby increase JPMorgan Chase's costs of doing business with this company. Most recently, the

¹ 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/>.

² NRDC, *Letter to JPMorgan Chase in Opposition to Saguaro Energia LNG Project* (February 7, 2025), <https://www.nrdc.org/sites/default/files/2025-02/letter-to-jpmorgan-chase-in-opposition-to-saguaro-energia-lng-project.pdf>.

decision by Mexico Pacific's principal equity owner, Quantum Capital Group, to begin offloading its stake in the energy company sends a strong signal that the Saguaro Energia LNG Project is a misguided and unsound investment.³ Quantum Capital Group has invested with Mexico Pacific since 2021, and has shared numerous executives with Mexico Pacific over the course of its investment.⁴ Coinciding with this divestiture, Mexico Pacific is now trimming down its U.S. office and reshuffling its staff.⁵ Mexico Pacific has also been reportedly renegotiating its construction contracts and supply purchase agreements with buyers due to rising costs.⁶ These operational disruptions are on top of delays that are anticipated as a result of violence from drug cartels and political risks, including the tariff wars with the US, as well as logistical challenges that have plagued other LNG projects along Mexico's Pacific Coast.⁷

Legal Risks

In addition to the direct financial and logistical hurdles outlined above, Mexico Pacific faces multiple lawsuits in connection with the Saguaro Energia LNG Project, obstructing the construction of the LNG plant as well as the construction of the pipeline 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 Energia LNG Project:** There are currently five lawsuits pending in Mexican courts that directly pertain to the Saguaro Energia LNG Project and are enjoining the project from beginning construction while the lawsuits are pending.⁸ (See the Appendix for further details)

³ 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/>. 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>.

⁴ Mexico Pacific, *Mexico Pacific Appoints Sarah Bairstow Chief Executive Officer* (April 12, 2024), <https://www.globenewswire.com/news-release/2024/04/12/2862313/0/en/Mexico-Pacific-Appoints-Sarah-Bairstow-Chief-Executive-Officer.html>.

⁵ See Energy Analytics Institute, *supra* note 3.

⁶ 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/>.

⁷ 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>.

⁸ 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/>. 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

- 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 allegedly improper modification of an environmental impact authorization for the Saguaro Energia LNG Project, from permitting the building of a regasification plant to permitting the construction of a liquefaction plant.
- Other constitutional lawsuits: four separate lawsuits have been filed by individuals with property rights, 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 agency violating such human rights.
- **Lawsuit challenging the Saguaro Connector Pipeline**: The Saguaro Energia 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),⁹ 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.¹⁰ 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

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.

⁹ *Id.*

¹⁰ 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>.

rupture due to seismic activity and local hydrological features.¹¹ The case is scheduled for a hearing on April 17, 2025.¹²

Risks to JPMorgan Chase

As the lawsuits proceed in court, the reputational risk associated with this project continues to worsen, with significant environmental opposition to this project coming from civil society actors as well as local communities. Over 30 civil groups have protested this LNG project's impact on the Gulf of California's biodiversity, and the resistance is growing to include opposition to the wider impacts of the project, including from the pipeline.¹³ In relation to the granting of Environmental Impact Evaluation Authorizations, Mexican law requires the government to consult with affected Indigenous communities in the case of projects that have a “high degree of impact,”¹⁴ with the purpose of obtaining their consent or agreement before proceeding with the project. Failure to meet this requirement has severely disrupted previous pipeline projects, such as the Tula-Tuxpan pipeline, which was delayed over six years due to opposition.¹⁵ These rights can be characterized as human rights, and we note that JPMorgan Chase has explicitly committed to “not knowingly provide financial services to clients where it determines that there is substantiated evidence of human rights violations and where such client has not put into place adequate practices and policies to remediate such human rights abuses.”¹⁶ The opposition from and risk of this project to communities therefore likely contravenes your bank’s commitment to human rights.

¹¹ 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>.

¹² 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>.

¹³ 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/>

¹⁴ 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>.

¹⁵ 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>.

¹⁶ JPMorgan Chase, *Human Rights*, <https://www.jpmorganchase.com/about/human-rights>.

Biodiversity

With respect to biodiversity, we understand that JPMorgan Chase has committed to conducting “enhanced due diligence” in connection with any clients whose activities are located in areas designated as UNESCO World Heritage Sites, legally protected areas, and habitats of biodiversity importance.¹⁷ The significant risks to biodiversity that will arise from the construction of the Saguaro Energia LNG Project, as outlined in the letter from NRDC, raise serious questions about the due diligence conducted by JPMorgan Chase or any financial institution that would advise, invest in, or finance Mexico Pacific.

Climate Change

We further note that the climate impacts associated with the construction of this LNG terminal are wholly inconsistent with the climate commitments and recognition of climate-related financial risks that JPMorgan Chase has communicated to investors and to consumers. Contrary to the 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 climate.¹⁸ The Saguaro LNG terminal itself is estimated to emit at least 5.7 million metric tons of CO² equivalent annually.¹⁹ The immense climate impacts associated with U.S. LNG exports were clearly recognized in the U.S. Department of Energy’s study on LNG exports released in December 2024,²⁰ based on which then Energy Secretary Jennifer Granholm stated: “special 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.”²¹

¹⁷ JPMorgan Chase, *2023 Environmental Social Governance Report (“ESG Report”)*, at 83, <https://www.jpmorganchase.com/content/dam/jpmc/jpmorgan-chase-and-co/documents/jpmc-esg-report-2023.pdf>

¹⁸ 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).

¹⁹ 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.

²⁰ 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.

²¹ 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/articles/statement-us-secretary-energy-jennifer-m-granholm-updated-final-analyses>.

We recognize and applaud JPMorgan Chase for its commitment to address the very real problem of methane leakage,²² which is rampant across the natural gas industry, particularly in the Permian Basin²³ where the Saguaro Energia LNG Project gas will be sourced. Given the Trump Administration's recent efforts to roll back the methane regulations that were intended to address this methane leakage,²⁴ and the broader plans by the federal government to discontinue any regulation of climate or environmental impacts, such as by rescinding NEPA regulations, abandoning the GHG endangerment finding by the EPA, and withdrawing from the Paris Agreement,²⁵ any expectation of more carefully monitored natural gas production in the US is highly unlikely. Methane is a potent greenhouse gas, trapping 84 times more heat than CO² over a 20-year timeframe.²⁶ The EPA had estimated that its leakage rules would prevent 1.2 million metric tons of methane emissions.²⁷ There can be no reasonable expectation for those reductions now.

Unfortunately, the rollback of these climate-related regulations will only serve to increase the systemic climate-related financial risks that JPMorgan Chase and other financial institutions acknowledge and purport to incorporate into their decision making and disclosures. Providing advisory or financial support to fossil fuel expanders such as Mexico Pacific contributes to the financial risks associated with the world's transition to net zero²⁸ as well as the climate-related physical risks that will disrupt normal business operations, burden government resources, and potentially lead to significant impacts on mortgage lending portfolios.²⁹ The risk of widespread devaluations and the stranding of carbon-

²² JPMorgan Chase, *The Methane Emissions Opportunity* (November 2023), https://www.jpmorgan.com/content/dam/jpm/cib/complex/content/redesign-custom-builds/carbon-compass/JPMC_methane.pdf.

²³ Environmental Defense Fund, *Permian Methane Analysis Project (PermianMAP)*, <https://www.permianmap.org/>.

²⁴ 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/>.

²⁵ Columbia Law School, *Climate Backtracker*, <https://climate.law.columbia.edu/content/climate-backtracker>.

²⁶ European Commission, *Methane Emissions*, https://energy.ec.europa.eu/topics/carbon-management-and-fossil-fuels/methane-emissions_en.

²⁷ 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>.

²⁸ 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.

²⁹ See, e.g. First Street, *11th National Risk Assessment: Portfolio Pressures* (September 2024), <https://firststreet.org/research-library/portfolio-pressures>. See also First Street, *The 12th National Risk Assessment Property Prices in Peril* (February 2025), <https://firststreet.org/research-library/property-prices-in-peril>.

intensive assets, particularly fossil fuel assets,³⁰ is widely recognized as a potential threat to global financial stability. If these risks materialize, they could wipe out trillions of dollars in asset value³¹ and significantly disrupt financial and price stability.³² Such impacts have the potential to trigger the next systemic financial crisis.³³

In light of these facts, JPMorgan Chase's advisory role with respect to Mexico Pacific's Saguaro Energia LNG Project are difficult to reconcile with its stated environmental and social commitments on climate, sustainability, and community development. These contradictions could potentially expose your company to claims of consumer deception³⁴ or investor misrepresentation under federal³⁵ or state securities laws,³⁶ and potential violations of fiduciary duty for failure to deal with shareholders honestly.³⁷ 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.³⁸ The Network for Greening the Financial System (NGFS) has noted and predicted a strengthening of this

³⁰ 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>.

³¹ 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).

³² See Mark Carney, *Resolving the Climate Paradox* (September 2016), <https://www.bis.org/review/r160926h.pdf>.

³³ 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>.

³⁴ 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>. See also Center for Climate Integrity, *Big Oil Accountability Lawsuits*, <https://climateintegrity.org/lawsuits>.

³⁵ Securities Exchange Act of 1934 (15 U.S.C. § 78j) 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).

³⁶ See, e.g., N.Y. General Business Law § 352 *et seq.*

³⁷ See, e.g. *Malone v. Brincat*, 722 A.2d 5, 10 (Del. 1998).

³⁸ 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>. 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>; 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/>.

trend,³⁹ particularly as laws governing prospectuses in the US and EU are acknowledged to present a relatively low bar for legal claims.⁴⁰ The EU Sustainable Finance taxonomy is being phased in, and will highlight any inconsistencies between public statements and underlying investments and/or business activities in Europe. Even short of risks of greenwashing and misrepresentation, JPMorgan Chase is increasing its reputational risk dramatically by associating with this controversial project.

In light of these risks, we therefore urge JPMorgan Chase 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 JPMorgan Chase 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.

We would welcome an opportunity to discuss these matters further. Please contact myself (jrossiter@clientearth.org) or my ClientEarth colleague Hana Heineken (hheineken@clientearth.org) to arrange a meeting.

Sincerely,



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ClientEarth USA

Cc: Heather Zichal, Global Head of Sustainability, JPMorgan Chase
Hana Heineken, Attorney, ClientEarth USA
Joel Reynolds, Senior Attorney, NRDC
Sujatha Bergen, Director, Global Energy Transition, NRDC

³⁹ 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; *Milieudefensie v. ING Bank* (2024), <https://climatecasechart.com/non-us-case/milieudefensie-v-ing-bank/>.

⁴⁰ 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.

Table Summarizing the Lawsuits against Saguaro Energía LNG Project

Type of claim	Admission date	Summary of claims
Constitutional lawsuit (Amparo) ¹	October 10, 2023	The plaintiff claimed that the following actions were unlawful: 1) 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.
Constitutional lawsuit (Amparo)	January 17, 2024	The plaintiff claimed that the authorization for the modification to expand of 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).
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.
Constitutional lawsuit (Amparo)	June 28, 2024	The plaintiff claimed that ASEA's ² 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 then to follow its due legal process, including a Public Consultation and a Public Hearing.
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.

¹ 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.

² Agencia de Seguridad, Energía y Ambiente (ASEA) [National Agency for Industrial Safety and Environmental Protection of the Hydrocarbons Sector].

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