

Regulatory Updates in the Hydrocarbons Sector

This document provides an overview of the most recent legislative reforms in the hydrocarbons sector, offering a concise and up-to-date synopsis of the regulatory changes that have impacted this industry. This note compiles and describes the most relevant developments, presented in chronological order to facilitate their understanding and analysis.

Below is a detailed account of the most significant developments in the hydrocarbons sector:

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OCT 2024

1. Constitutional Reform in Strategic Areas and State-Owned Enterprises

On October 31, 2024, the Decree amending, supplementing, and repealing various provisions of Articles 25, 27, and 28 of the Political Constitution of the United Mexican States, regarding certain strategic areas and state-owned enterprises ("**Constitutional Reform on Strategic Areas and State-Owned Enterprises**"). entered into force. Among the most relevant aspects of the Constitutional Reform on Strategic Areas and State-Owned Enterprises are the following:

- Transformation of *Petróleos Mexicanos* ("**Pemex**") from a State Productive Enterprise to a State Public Enterprise.
- Primacy of State Public Enterprises in energy industry activities.

For a more detailed summary of the Constitutional Reform in Strategic Areas and State-Owned Enterprises, please click on the following [link](#).

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FEB 2025

2. New Secondary Laws for the Hydrocarbons Sector

On February 18, 2025, the Decree issuing eight new secondary laws and amending three others related to the energy sector was published in the Official Gazette of the Federation ("**DOF**"). These laws form part of the Constitutional Reform in Strategic Areas and State-Owned Enterprises ("**Secondary Laws**"), and include, among others, the Hydrocarbons Sector Law ("**HSL**"), the State Public Enterprise Law – *Petróleos Mexicanos* ("**Pemex Law**"), the National Energy Commission Law ("**CNE Law**"), and the Biofuels Law.

The most relevant aspects of the Secondary Laws include the following:

a. HSL.

- A new National Energy Commission ("**CNE**") replaces and assumes the functions of the Energy Regulatory Commission ("**CRE**") and the National Hydrocarbons Commission ("**CNH**").
- A new allocation framework for hydrocarbons exploration and extraction activities is established through: (i) Internal Development (Pemex); (ii) Mixed Development (Pemex and the private sector); and (iii) Exploration and Extraction Contracts (private sector).
- Priority is granted to Pemex in integrated systems, and it is exempted from the open access obligation.

b. Pemex Law.

Pemex is integrated vertically, and the following subsidiaries are dissolved: Pemex Exploration and Production, Pemex Industrial Transformation, and Pemex Logistics.

c. CNE Law.

The CNE is established as a sectoral body under the Ministry of Energy ("**SENER**"), with the mandate to regulate, supervise, and impose sanctions on energy-related activities, including those in the electricity and hydrocarbons sectors.

d. Biofuels Law.

The Biofuels Law aims to regulate and promote the sustainable development of biofuels, defined as gaseous, liquid, or solid fuels produced from the direct energy use of biomass or obtained through its processing.

For a more detailed summary of the decree on Secondary Laws, please click on the following [link](#).

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ABR 2025

3. Internal Regulations of SENER

On April 17, 2025, the new Internal Regulations of the Ministry of Energy ("**SENER Regulations**") were published in the DOF. The SENER Regulations establish the organization and functioning of SENER, as well as the powers, structure, and responsibilities of its administrative units and sectoral decentralized bodies. Regarding hydrocarbons, the Regulations provide for the creation of the Undersecretariat of Hydrocarbons.

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ABR 2025

4. Operating Rules of SENER's Committee on Allocations, Contracts, and Permits

On April 23, 2025, the Operating Rules of the Committee on Allocations, Contracts, and Permits of the Ministry of Energy ("**SENER Operating Rules**") were published in the DOF. The SENER Operating Rules establish the creation of the Committee on Allocations, Contracts, and Permits of SENER ("**Allocations Committee**"), which is responsible for reviewing and resolving matters related to allocations, contracts, permits, authorizations, concessions, and other legal transactions under SENER's jurisdiction. The Allocations Committee will have a range of powers and responsibilities in the areas of (i) energy transition and planning, (ii) electricity, and (iii) hydrocarbons.

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ABR 2025

5. SENER Resumes Administrative Timelines and Deadlines

On April 29, 2025, the Resolution resuming the timelines and deadlines for the receipt and processing of matters under the jurisdiction of the Ministry of Energy ("**SENER Timeline Resolution**") was published in the DOF. The SENER Timeline Resolution resumes, as of April 30, 2025, the timelines and deadlines for handling matters under SENER's jurisdiction, including exploration and extraction contracts. However, the timelines for proceedings related to marketing, transportation, and storage permits for petroleum remain suspended until a new resumption resolution is issued by the CNE.

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MAY 2025

6. Internal Regulations of the CNE

On May 8, 2025, the new Internal Regulations of the National Energy Commission ("**CNE Regulations**") were published in the DOF. The most relevant aspects of the CNE Regulations include the following:

- The CNE is recognized as a decentralized administrative body of SENER, with a technical nature and technical, operational, managerial, and decision-making autonomy.

- A General Directorate, Technical Committee, and Administrative Units are established within the CNE for the analysis, planning, and resolution of matters under its jurisdiction.
- A Hydrocarbons Unit is created, which will be responsible for: (i) proposing draft decisions to grant or deny permits for hydrocarbons-related activities; (ii) proposing regulations in the hydrocarbons sector; and (iii) coordinating the monitoring of market behavior and commercial transactions related to hydrocarbons.

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JUN 2025

7. CNE Resumes Administrative Timelines and Deadlines

On June 5, 2025, the Resolution resuming the timelines and deadlines for the receipt and processing of matters under the jurisdiction of the National Energy Commission ("**CNE Timeline Resolution**") was published in the DOF. The CNE Timeline Resolution lifts the suspension of timelines and deadlines established in the Eighth Transitory Article of the CNE Law. Accordingly, as of June 6, 2025, the CNE resumed the receipt, processing, and resolution of certain matters within its jurisdiction.

The CNE Timeline Resolution also provides that, in certain cases, timelines and deadlines will remain suspended until the regulations of the new laws in the energy sector enter into force.

Moreover, the CNE Timeline Resolution stipulates that matters initiated before the now-dissolved CRE prior to March 18, 2025, and still pending resolution, must have been ratified before the CNE in order for their processing to continue.

For a more detailed summary of the CNE Timeline Resolution, please click on the following [link](#).

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JUN 2025

8. CNE Technical Committee Begins Sessions

As a result of the CNE Timeline Resolution, the CNE Technical Committee began operating as of June 5, 2025. Consequently, the publication of the rulings related to the granting of permits, authorizations, and other transactions pending prior to the publication of the Secondary Laws began on June 11, 2025.

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JUN 2025

9. Amendment to the Operating Rules of the SENER Committee on Allocations, Contracts, and Permits

On June 24, 2025, the Resolution amending the SENER Operating Rules ("**Amendment of the SENER Operating Rules**") was published. The Amendment of the SENER Operating Rules introduces a series of modifications to the structure of the Allocations Committee, as well as to certain powers and responsibilities in the areas of: (i) energy planning and transition, (ii) electricity, and (iii) hydrocarbons.

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JUL 2025

10. Simplification of the Permit Procedure for Retail Sales

On July 11, 2025, the Resolution by which the CNE modifies the procedure for granting permits for the retail sale of petroleum products at service stations ("**Simplification Resolution**") was published in the DOF. The Simplification Resolution simplifies the procedure by replacing various technical and documentary requirements with a single application form and reduces the resolution period from 90 to 70 business days. Finally, it provides that applications ratified before the CNE pursuant to the CNE Timeline Resolution will continue to be processed under the previous procedure.

At Von Wobeser y Sierra, we are at your disposal to assist with any questions or to help you comply with your obligations in the hydrocarbons sector. Should you require additional information, please do not hesitate to contact our partners who specialize in this area:

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