THE MINISTRY OF ENERGY ISSUES THE HYDROCARBONS SECTOR DEVELOPMENT PLAN 2025-2039

On September 7, 2026, the agreement whereby the Ministry of Energy (the "**SENER**") issues the *Hydrocarbons Sector Development Plan* (the "**PLADESHi**") was published in the Federal Official Gazette.[1]

The PLADESHi is issued as the principal planning instrument for the hydrocarbons sector, as provided for in the Energy Planning and Transition Law, and consolidates its binding nature pursuant to the Hydrocarbons Sector Law (the "**LSH**"). It establishes a fifteen-year planning horizon subject to annual review.

The PLADESHi coordinates strategic actions relating to the exploration, extraction, processing, transportation, storage, and marketing of hydrocarbons, among other activities in the value chain. Its central pillars include the strengthening of energy sovereignty and security, the reduction of external dependence on hydrocarbons, infrastructure modernization, and the energy transition.

The following is an executive summary of the PLADESHi, highlighting its most relevant aspects and implications for participants in the hydrocarbons sector:

1. Private participation in exploration and extraction

The PLADESHi consolidates binding planning for the hydrocarbons sector under SENER's leadership and reinforces the role of Petróleos Mexicanos ("**PEMEX**") as a State-owned Public Company. Under this model, the objectives are to strengthen domestic production, ensure the supply of hydrocarbons and their derivatives, modernize existing infrastructure, and reduce external dependence, while also recognizing the participation of private parties in various activities along the value chain.

In this context, the PLADESHi contemplates maintaining domestic production of liquid hydrocarbons at approximately 1.8 million barrels per day and achieving natural gas production of 5,000 million cubic feet per day during its planning horizon.

With respect to exploration and extraction activities, the PLADESHi recognizes the coexistence of assignments and contracts granted or entered into under the previous legal framework with the new mechanisms introduced by the 2025 energy reform. As of December 31, 2024, 104 Hydrocarbon Exploration and Extraction Contracts remained in force. The PLADESHi provides that, pursuant to the transitional regime of the LSH, assignments and contracts granted or entered into prior to the entry into force of the LSH remain in effect under the terms and conditions under which they were originally granted or entered into.

2. Assignments and Mixed Development projects

Pursuant to the LSH, Assignments for Mixed Development constitute one of the mechanisms provided under the new framework for the development of exploration and extraction activities. Under these arrangements, SENER grants an Assignment to PEMEX, which may supplement its technical, operational, financial, or execution capabilities through the participation of private parties, with the purpose of incorporating technology, optimizing costs, improving risk management, and expediting project execution.

1. Capitalized terms used in this document that are not expressly defined herein shall have the meaning assigned to them in the PLADESHi.

The selection of private participants will be carried out through processes authorized by PEMEX's Board of Directors, taking into consideration, among other factors, the added value they may contribute in terms of reserve recovery, operational efficiency, and regulatory compliance.

The PLADESHi identifies 21 Mixed Development projects, of which, as of December 31, 2024, seven had been awarded, seven had been approved, and the remainder were in preparation. These projects include onshore, shallow-water, deepwater, and ultra-deepwater developments. Projects specifically identified include Agua Fría, Macavil, Nobilis-Maximino, Pit-Kayab-Utsil, Sejkan-Tlatitok Sur, Macuil-Paki, Rabasa, Cinco Presidentes-Rodador, San Ramón, and Madrefil-Bellota, among others.

3. Natural gas transportation and storage

Natural gas is another of the PLADESHi's main pillars, as it recognizes Mexico's current dependence on imports of this energy source and establishes as a priority increasing domestic production and strengthening the infrastructure necessary for its transportation, storage, and supply, particularly to meet demand from the electricity and industrial sectors.

With respect to natural gas infrastructure, the PLADESHi contemplates the rehabilitation and modernization of existing systems, the development of new capacity, and strategies to strengthen strategic and operational natural gas storage to address contingencies. It also provides for private sector participation in the development of transportation and storage infrastructure, subject to the applicable regulatory framework.

Projects identified by the PLADESHi include: (i) projects by PEMEX to strengthen transportation capacity for petroleum products and natural gas; (ii) projects by the Federal Electricity Commission (CFE) to expand the supply of natural gas in various regions of the country; and (iii) projects by the National Natural Gas Control Center (CENAGAS) aimed at the expansion, rehabilitation, and modernization of the National Integrated Natural Gas Transportation and Storage System (SISTRANGAS). The latter include Cuxtal II, Centauro del Norte, Ramal Paraíso, Re-Ruteo Guaymas-El Oro, Re-Ruta Tuxpan-Tula, Gasoducto Coatzacoalcos II, Interconexión Cosoleacaque, Interconexión Ramones Fase II Sur, and Gasoducto Arco Tula, among others.

4. Industrial transformation and domestic supply

The PLADESHi also proposes strengthening the industrial processing of hydrocarbons, particularly through the rehabilitation of the National Refining System, gas processing complexes, and petrochemical infrastructure.

The strategy seeks to increase domestic production of petroleum products, petrochemicals, and fertilizers, and to prioritize supply to the domestic market. These guidelines are relevant for importers, marketers, storage operators, and transporters in assessing market developments and future infrastructure needs.

5. Social impact, sustainability, and energy transition

The PLADESHi incorporates, on a cross-cutting basis, criteria of energy justice, social impact, and sustainability in the development of new projects. From a social standpoint, it highlights the Energy Sector Social Impact Assessment and related social management plans, as well as reporting, monitoring, and verification obligations and consultation processes that may be applicable to Indigenous and Afro-Mexican peoples and communities.

From an environmental standpoint, the PLADESHi contemplates measures relating to energy efficiency, emissions reduction, and natural gas utilization. In particular, it notes that applicable regulations require petroleum operators —both PEMEX and private operators—to achieve and maintain 98% utilization of natural gas in the petroleum projects they undertake. The PLADESHi also incorporates objectives for the progressive reduction of methane emissions arising from exploration and extraction activities.

6. Considerations for sector participants

Taken together, the PLADESHi provides a planning framework for the development of the sector over the next fifteen years and allows stakeholders to identify both public policy priorities and areas in which new investment needs are anticipated.

For operators, investors, and other private participants, the following aspects are particularly noteworthy: Mixed Development arrangements with PEMEX, the development of new exploration and extraction projects, the expansion of natural gas transportation and storage infrastructure, and the importance of incorporating social, environmental, and energy transition considerations at the project-structuring stage.

Von Wobeser y Sierra remains at your disposal to advise you regarding the implications of the PLADESHi and its impact on projects and operations in the hydrocarbons sector.

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