NEWSLETTER ENERGY & NATURAL RESOURCES

JUNE 2026

The energy world is under enormous transformation. Issues such as energy transition, energy security and climate change are in the global agenda. Thanks to its natural resources endowment, Argentina has a key role to play in the energy and mining sector. This newsletter intends to inform, with an analytical approach and on a monthly basis, the most relevant events, regulations, and case law taking place in our country.

IN THIS ISSUE

GENERAL DEFINED TERMS

"**ENRGE**" means the National Gas and Electricity Regulatory Entity (for its acronym in Spanish of *Ente Nacional Regulador del Gas y la Electricidad*).

"**ME**" means the Federal Ministry of Economy.

"**FSE**" means the Federal Secretariat of Energy.

"**USEE**" means the Under-Secretariat of Electric Energy.

"**PEN**" means the Federal Executive Branch (for its acronym in Spanish of *Poder Ejecutivo Nacional*).

"**MEM**" means the Wholesale Electricity Market (for its acronym in Spanish of *Mercado Eléctrico Mayorista*).

"**CAMMESA**" means "*Compañía Administradora del Mercado Mayorista Eléctrico S.A.*"

HYDROCARBONS

GAS REGULATION: ENRGE EXTENDS NAG-444 COMPLIANCE DEADLINE FOR CYLINDER TESTING CENTERS

ENRGE extended by thirty (30) additional calendar days the term granted to Periodic Cylinder Testing Centers to complete their adaptation to Technical Standard NAG-444 (2026), originally established under Resolution No. 329/2026. The extension applies to all CRPC engaged in the certification of technical fitness for compressed natural gas cylinders and grants additional time to finalize the required facility, equipment and documentation adjustments.

By means of Resolution No. 120/2026, published in the Official Gazette on June 19, 2026 ("**Resolution 120**"), the ENRGE extended by thirty (30) calendar days, counted as from the original expiration date, the terms established under Articles 1 and 2 of Resolution No. 329/2026[1] of the former National Gas Regulatory Authority ("**ENARGAS**"), applicable to Periodic Cylinder Testing Centers ("**CRPC**") for compressed natural gas cylinders.

As previously reported, Resolution No. 329/2026 granted CRPC a ninety (90)-day term to adapt their Certifications of Technical Fitness to the updated NAG-444 (2026) standard, as well as the same term to adapt their facilities and equipment and to prepare the technical manuals required thereunder.

The extension was granted following requests filed by TA Gas Technology S.A.U. and Qualicontrol S.A. and considering that a significant proportion of CRPC remained in the process of completing the adaptation requirements set forth by NAG-444 (2026), ENRGE deemed it reasonable to grant an additional term for compliance.

For CRPC operators, Resolution 120 provides additional time to finalize the adaptation of Certifications of Technical Fitness, facilities, equipment and technical manuals required under NAG-444 (2026), without amending the substantive requirements introduced by such standard. Operators should continue to monitor compliance deadlines and ensure timely completion of the adaptation process, as no further extension has been announced to date.

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[1] Please refer to MHR's Energy Newsletter: March 2026, for a detail of Resolutions No. 96/2026, No. 103/2026 and No. 329/2026, approving the updated Technical Standard NAG-444, introducing amendments to Technical Standard NAG-100, and establishing the original ninety (90)-day term for CRPC adaptation.

PROPANE GAS: THE FSE UPDATES THE PRICE TO BE INCLUDED IN TARIFF SCHEDULES

The FSE increased the percentage of the undiluted propane gas price to be reflected in tariff schedules for localities supplied through pipeline networks

By means of Resolution No. 126/2026, published in the Official Gazette on June 3, 2026 ("**Resolution 126**"), the FSE amended Section 8 of Resolution No. 41/2024, updating the methodology for determining the value of undiluted propane gas to be incorporated into tariff schedules for localities supplied by propane pipeline systems.

Under the previous framework established by Resolution No. 41/2024 as amended by Resolution FSE No. 278/2025,[2] ENARGAS was instructed to include forty percent (40%) of the propane gas price determined pursuant to the pricing methodology set forth in Resolution No. 36/2015. Resolution 126 increases such percentage to sixty percent (60%).

Accordingly, the ENRGE must include in the applicable tariff schedules a value equivalent to sixty percent (60%) of the propane gas price calculated under Resolution No. 36/2015 and in force as of the twentieth (20th) day of the month preceding the effectiveness of the respective tariff schedules. The ENRGE must also update the applicable tariff schedules whenever such reference price is modified.

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[2] Please refer to MHR's Energy Newsletter: June 2025, for a detail of the previous updates.

AUTHORIZATION GRANTED FOR THE CONSTRUCTION OF THE GAS PIPELINE CROSSING CERROS COLORADOS HYDROELECTRIC CONCESSION AREA

The FSE authorized YPF S.A. to construct a gas pipeline crossing the perimeter of the Cerros Colorados Hydroelectric Complex concession block (Province of Neuquén).

By means of Resolution No. 141/2026, published in the Official Gazette on June 23, 2026, the FSE authorized YPF to execute the construction works of the "*Gasoducto PC LAS a Colector 13 ISTMO*" gas pipeline (the "**Pipeline**"), serving the La Angostura I and II Unconventional Exploitation Concession blocks and the Loma La Lata – Sierra Barrosa blocks, in the section crossing the concession perimeter of the Cerros Colorados Hydroelectric Complex (“**Complex**”), whose concession is held by Cerros Colorados Hidroeléctrica Argentina S.A. and operated by Edison Inversiones S.A.U.

The regulatory process involved multiple agencies. The Dam Safety Regulatory Body (“**ORSEP**”) confirmed that the Pipeline does not interfere with the dam closure structure or existing auscultation instruments but flagged that pipeline sections between chainages 13+500 and 14+000 lie below the normal and extraordinary maximum water levels of the Mari Menuco reservoir, a condition that YPF S.A. must account for during construction and operation. The Interjurisdictional Authority of the Limay, Neuquén and Negro River Basins (“**AIC**”) determined that the Pipeline does not represent a significant impact on the environmental protection and water management standards of the Concession Contract, while issuing a series of environmental recommendations applicable to the evaluation process. The Concession Operator, Edison Inversiones S.A.U., provided its conformity to the works on April 7, 2026, following YPF's constitution of a sworn guarantee (*caución juratoria*) in its favor to cover any damages arising from the construction, including those related to the remediation of the environmental incident at Loma La Lata (LLL-401).

The Province of Neuquén's Secretary of Environment and Natural Resources (“**SARN**”, for its acronym in Spanish) by means of Resolution 672/2026 approved the Environmental Impact Assessment (“**EIA**”) on April 29, 2026, subject to conditions including: (i) backfilling of excavated sections in compliance with specified closure procedures; (ii) installation of shut-off valves on both sides of water-crossing sections; (iii) use of water from duly authorized sources; (iv) engagement of waste management contractors holding valid environmental certifications (including the Special Environmental Certificate — CAE); (v) formal notification to SARN of commencement, expected duration and completion of works; (vi) procurement of environmental liability insurance with sufficient coverage; and (vii) maintenance of a copy of the EIA and applicable resolutions at the worksite.

Non-compliance with any of these conditions may result in revocation of the Environmental Licence and administrative sanctions.

Resolution No. 141/2026 establishes that YPF must: comply in full with SARN Resolution No. 672/2026; implement prevention, mitigation and contingency measures set out in its Environmental Management Program and EIA throughout all project stages; and observe ORSEP's technical recommendations regarding the Mari Menuco reservoir flood levels. The resolution further clarifies that its terms do not modify the Cerros Colorados concession contract or its sub-annexes, and that works remain subject to ongoing oversight by Edison Inversiones S.A.U., AIC, ORSEP and SARN within their respective competences.

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EXTENSION OF OPERATION OF THE FUTALEUFÚ HYDROELECTRIC SYSTEM

The FSE established the terms for the continued operation of the Futaleufú Hydroelectric System following the expiration of its concession.

By means of Resolution No. 130/2026, published in the Official Gazette on June 9, 2026 (“**Resolution 130**”), the FSE established the terms under which Hidroeléctrica Futaleufú S.A. may continue operating the Futaleufú Hydroelectric System following the expiration of its concession.

Resolution 130 follows the expiration, on June 15, 2025, of the thirty-year concession granted in 1995 for the operation and exploitation of the Futaleufú hydroelectric complex. The concessionaire has continued operating the complex under successive transition periods intended to preserve safety, continuity of supply and an orderly transfer of assets.

The measure was issued in the context of the National Government's intention to launch a new national and international public tender for the reconcession of the Futaleufú Hydroelectric System, in accordance with the new Article 21 bis of Law No. 15,336, incorporated by Decree No. 450/2025.

Under Resolution 130, Hidroeléctrica Futaleufú S.A. will continue operating the complex provided that it submits the approved adhesion letter within seven (7) calendar days from the resolution's effective date. Once submitted, the concessionaire may continue operating until December 15, 2026, inclusive, or until completion of the new tender process, whichever occurs first.

If the concessionaire does not adhere to the extension, it will nevertheless be required to continue generating electricity for at least ninety (90) calendar days, so that the National Government may adopt the measures necessary to ensure service continuity and supply reliability.

Resolution 130 also provides that Aluar Aluminio Argentino S.A.I.C. will continue operating under the conditions set forth in the agreement dated June 15, 1994, and any amendments thereto, subject to its express conformity being submitted to the FSE within five (5) calendar days from the resolution's effective date.

The extension is subject to several conditions, including continued compliance with the 1995 concession and supply agreements, an updated performance bond of not less than USD 1.5 million, continuation of the royalty scheme applicable to the Province of Chubut, quarterly inventory reporting, postponement of the transfer of concession assets, and the obligation to allow site visits by interested bidders. The USEE remains as observer, and the Province of Chubut is invited to appoint a representative.

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POWER AND ELECTRICITY

ENRGE AUTHORIZES TRANSFER OF CITELEC SHARES TO TESA

ENRGE granted regulatory clearance for the transfer of the 50% stake in CITELEC held by ENARSA to TESA, the vehicle jointly incorporated by Edison Transmisión S.A. and Genneia S.A. to consummate the acquisition.

By means of Resolution No. 130/2026, published in the Official Gazette on June 22, 2026, the ENRGE authorized the transfer of shares of Compañía Inversora en Transmisión Eléctrica S.A. (“**CITELEC**”) — the holding company that controls Compañía de Transporte de Energía Eléctrica en Alta Tensión Transener S.A. (“**TRANSENER**”) and Empresa de Transporte de Energía Eléctrica por Distribución Troncal de la Provincia de Buenos Aires S.A. (“**TRANSBA**”) — from Energía Argentina S.A. (“**ENARSA**”) to Transmisión Eléctrica S.A. (“**TESA**”), a newly incorporated company whose shareholders are Edison Transmisión S.A. and Genneia S.A. in equal parts. The authorization was required as an essential condition precedent under Articles 4 and 5 of the Share Purchase Agreement (“**SPA**”) executed on June 4, 2026, and must be obtained within a maximum period of one year from its execution.

The privatization process was advanced through a series of regulatory steps. ME Resolution No. 2090/2025 launched the public tender and approved the Terms and Conditions. ME Resolution No. 281/2026 subsequently introduced key modifications to the bidding terms, including updates to the applicable exchange rate for financial calculations and the authorization of technical site visits[3]. Following technical pre-qualification of three bidders and the opening of economic offers on April 28, 2026, ME Resolution No. 673/2026 adjudicated the tender to the Edison Transmisión–Genneia consortium for USD 356,174,811.78 (excluding VAT), above the reserve price set by the Banco de Inversión y Comercio Exterior S.A. (BICE) valuation[4]. The SPA was executed on June 4, 2026, with the ENRGE authorization as the last outstanding regulatory closing condition.

In its review, ENRGE assessed (i) the potential for market power abuse arising from the new shareholding structure, and (ii) compliance with the vertical and horizontal unbundling restrictions of Articles 30 and 31 of Law No. 24,065. On both points, the ENRGE found no impediment to the transfer, noting that the existing regulatory framework of the MEM —including open access obligations and the centralized role of CAMMESA— limits the capacity of the transporter to grant selective advantages, and that the 50% co-control position shared with Pampa Energía S.A. does not confer "majority shareholder" status under the cited provisions.

The authorization is limited to the transfer of CITELEC's shareholding structure and does not modify the regulatory framework governing TRANSENER's or TRANSBA's concessions. ENRGE expressly retained its full supervisory powers over service quality, safety and continuity of the concession.

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[3] Please refer to MHR’s Energy Newsletter: March 2026 for more information regarding this matter.
[4] Please refer to MHR’s Energy Newsletter: May 2026 for more information regarding this matter.

THE FSE QUALIFIES BIDS UNDER THE ALMASADI GRID-SCALE STORAGE TENDER

The FSE determined the qualification of the offers submitted under the AlmaSADI open call for energy storage plants providing reserve and reliability services to the MEM, advancing the tender to its economic-evaluation stage amid significant oversubscriptions.

By means of Resolution No. 136/2026, published in the Official Gazette on June 18, 2026 (“**Resolution 136**”), the FSE determined the qualification of the bids submitted under the National and International Open Call for the “Supply of Electricity from Storage Plants for Reserve and Reliability in the MEM” (“**AlmaSADI**”). Resolution 136 qualifies the substantial majority of the offers received and instructs CAMMESA to proceed with the opening of the corresponding economic proposals, thereby moving the tender into its decisive, price-competitive phase.

AlmaSADI was launched by FSE Resolution No. 50/2026 to contract new battery energy storage systems (BESS) across the Argentine Interconnection System (SADI), with a referential target of 700 MW.[5] The tender seeks capacity able to deliver firm power for at least four

[5] Please refer to MHR's Energy Newsletter: March 2026, for a detail of Clarifying Circulars No. 1, 2 and 3.

consecutive hours and to provide short-term operating reserves and frequency regulation services. Successful bidders will enter into storage agreements with CAMMESA — which acts as the contracting counterparty and pays the corresponding price on a monthly basis — for a maximum term of fifteen (15) years from the commercial authorization of each facility, remunerated principally through a capacity payment expressed in USD per MW-month and complemented by payments for energy supplied and frequency regulation. The associated cost is incorporated into the MEM's economic transactions as a reliability-reserve service borne by aggregate demand. The scheme extends nationwide the approach first deployed through the "AlmaGBA" call (by means of FSE Resolution No. 67/2025), which targeted 500 MW in the Buenos Aires metropolitan area and ultimately awarded 713 MW.

Following its launch, the bidding terms were progressively refined through a series of clarifying circulars that adjusted the connection nodes and the regional allocation of the capacity to be awarded, updated the remuneration parameters, including the price of supplied energy, the consumption charge and the remuneration of primary frequency regulation. Additionally, they set a target commercial date of May 1, 2027, together with a pre-award mechanism to reach the 700 MW objective within a tolerance of up to 10%.[6] Resolution 136 ratifies and incorporates these circulars and the additional-connection-nodes notice into the bidding terms, thereby consolidating the rules applicable to the process.

The tender follows a two-envelope structure that separates the technical and legal qualification of the bids ("**Envelope A**") from their economic terms ("**Envelope B**"), with only those bidders qualified in the first stage advancing to the opening of their price offers. Following the opening of Envelopes A on May 27, 2026, a total of 235 offers were recorded, representing approximately 8,338 MW of offered capacity — nearly twelve times the 700 MW referential target. On the basis of the non-binding pre-qualification report submitted by CAMMESA on June 12, 2026, the FSE excluded three offers that presented insurmountable deficiencies under the bidding terms and confirmed the remaining offers as qualified. It further instructed CAMMESA to open Envelope B of the qualified offers in accordance with the approved schedule and to notify bidders of their qualification status. Accordingly, Annex I of Resolution 136 identifies each qualified and non-qualified offer, reflecting projects distributed across a broad range of provinces and electrical regions, including: (i) Buenos Aires, (ii) Cuyo, (iii) Pampa, (iv) Centro, (v) the Northeast, (vi) the Litoral, and (vii) the Northwest.

With the technical stage now concluded, competition will turn to price, and the outcome of the economic evaluation will define the volume of storage capacity ultimately contracted and the participants awarded storage agreements. The strong response to AlmaSADI suggests that battery storage is poised to play an increasingly central role in the Argentine power market.

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[6] Please refer to MHR's Energy Newsletter: April 2026, for a detail of Resolution FSE No. 50/2026.

TARIFF AND PRICE UPDATES

INCREASE IN BIOFUELS MANDATORY PURCHASE PRICES

The FSE updated the minimum purchase prices for biodiesel for mandatory blending with gasoline and diesel oil.

By means of Resolutions Nos. 123/2026 and 124/2026, both published in the Official Gazette on June 1, 2026 (the "**Resolutions**"), the FSE updated the minimum purchase prices for bioethanol and biodiesel intended for mandatory blending with gasoline and diesel oil, effective for transactions during June 2026 and until further notice.[7]

The current minimum prices after the modifications introduced by the Resolutions are the following: [8]

Bioethanol Minimum Purchase Prices

- Sugarcane-based bioethanol: The minimum purchase price is set at ARS 1,023.152 per liter (approximately, USD 0.67).

- Corn-based bioethanol: The minimum purchase price is set at ARS 937.750 per liter (approximately, USD 0.62).

- Payment Terms: Purchasers must pay for bioethanol within thirty (30) calendar days from the date of the corresponding invoice.

Biodiesel Minimum Purchase Price

- Biodiesel for blending with diesel oil: The minimum purchase price is set at ARS 1,858,424 per ton (approximately, USD 1,230.74).

- Payment Terms: Payment for biodiesel must be made within seven (7) calendar days from the date of the relevant invoice.

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[7] Please refer to MHR's Energy Newsletter: February 2026 and April 2026, for a detail of the previous updates.
[8] All conversions consider the official sellers exchange rate published by Banco de la Nación Argentina on July 1, 2026, of USD 1 = ARS 1510.

NEW TARIFF SCHEDULES FOR PROPANE GAS DISTRIBUTION AND MODIFICATION OF SEASONAL ADJUSTMENT PERIODS

ENRGE Approved New Tariff Schedules for Propane Gas. SE Modified Seasonal Adjustment Periods.

By means of Resolutions No. 59, 60, 61, 62, 63, and 64/2026, published in the Official Gazette on June 4, 2026, the ENRGE approved new tariff schedules to be applied to (i) Camuzzi Gas Pampeana S.A., (ii) Distribuidora de Gas Cuyana S.A., (iii) Gas NEA S.A., (iv) Camuzzi Gas del Sur S.A., (v) Litoral Gas S.A., (vi) Naturgy Ban S.A..[9]

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[9] Please refer to MHR's Energy Newsletter: May 2026 for a detail of the previous updates.

ENVIRONMENTAL

NEUQUÉN DECLARES EFFICIENT WATER USE A PUBLIC POLICY PRIORITY

Neuquén elevates water reuse and recirculation in unconventional hydrocarbon operations to a public policy priority, complementing the new water-use fee.

By means of Decree No. 792/2026, issued on June 4, 2026 ("**Decree 792**"), the Province of Neuquén declared the promotion of water reuse, recirculation, recovery, and efficient use in unconventional hydrocarbon activities to be a priority public policy. Decree 792 complements the Subsecretariat of Water Resources Resolution No. 260/2026 ("**Resolution 260**"), which introduced a new water-use fee applicable to water consumed in unconventional exploration and production activities.

Decree 792 recognizes water as a strategic natural resource and highlights the increasing demand associated with unconventional hydrocarbon development, particularly in the Vaca Muerta formation. It further notes that the availability of technologies for water reuse and recirculation justifies the adoption of regulatory measures aimed at encouraging more sustainable water management.

In this context, Decree 792 expressly endorses the pricing mechanism established by Resolution 260, under which the water-use fee for unconventional exploration (U.2.2) and unconventional production drilling (U.2.4) categories are linked to the market price of YPF Grade 3 Fuel Oil. Beginning on July 1, 2026, the fee will be calculated as the monetary equivalent of 2.5 liters of Grade 3 Fuel Oil per cubic meter of water, increasing to 3 liters per cubic meter as from January 1, 2027, with automatic adjustments based on the prevailing fuel price.

The new framework seeks to create economic incentives for operators to optimize water consumption and increase the reuse of produced and recovered water in unconventional operations. In doing so, Neuquén reinforces its regulatory strategy of balancing the continued development of unconventional hydrocarbon resources with the sustainable management of provincial water resources.

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RÍO NEGRO ESTABLISHES WATER USE FEE FOR HYDROELECTRIC CONCESSIONS

Río Negro establishes the consideration payable for the special use of provincial water resources by hydroelectric concessionaires and grants the corresponding water-use concessions to the new operators of Alicurá, El Chocón and Piedra del Águila.

By means of Law No. 5,858, enacted on June 11, 2026, and promulgated by Decree No. 598/2026 (the "**Decree 598**"), the Province of Río Negro established the consideration payable for the special use of provincial water resources for hydroelectric generation, within the framework of the ongoing re-privatization process of the Comahue hydroelectric facilities.

The Law provides that the consideration for the special use of water resources, as contemplated under Law No. 5,707, shall be equal to 1% of the total revenues invoiced by the concessionaire from sales in the MEM including all remunerated concepts established by the FSE. The fee may increase to 2% if the Province of Neuquén waives its right to collect the corresponding consideration in connection with shared water resources.

Additionally, the Law grants the special water-use concession over provincial water resources to the concessionaires designated under International Public Tender No. 504/2-0001-CPU25 for the acquisition of the controlling shareholdings of Alicurá Hidroeléctrica Argentina S.A., Chocón Hidroeléctrica Argentina S.A., and Piedra del Águila Hidroeléctrica Argentina S.A.

The Secretariat of Energy and Environment of Río Negro was designated as the enforcement authority and entrusted with implementing, supervising, and collecting the water-use consideration. Such Secretariat is also empowered to issue the complementary regulations necessary to determine the calculation methodology, payment procedures, verification mechanisms, and other operational aspects of the regime.

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INSIGHTS ON THE ARGENTINE ENERGY INDUSTRY

MINING INVESTMENT REGIME: GOVERNMENT MODERNIZES REGULATORY FRAMEWORK

New decree updates the implementing regulations of Argentina's mining investment regime, simplifying administrative procedures and modernizing fiscal benefits.

By means of Decree No. 482/2026, published in the Official Gazette on June 23, 2026 ("**Decree 482**"), the PEN replaced the implementing regulations of Argentina's Mining Investment Regime established under National Law No. 24,196.

The new framework modernizes registration, fiscal stability, VAT refunds, import procedures and reporting obligations, while introducing measures aimed at reducing administrative burdens and enhancing legal certainty for mining projects.

Among its principal changes, the new regulation updates the registration regime applicable to mining companies and mining service providers, establishing more detailed eligibility requirements, introducing a specific framework for service providers, and requiring all registered beneficiaries to constitute an electronic legal domicile for all communications with the Enforcement Authority.

Decree 482 also modernizes the fiscal stability regime by clarifying the procedure and timing for obtaining the corresponding certificate, confirming that fiscal stability becomes effective as from the filing of the feasibility study (or the complementary information leading to its approval), and requiring beneficiaries to notify any substantial changes to their projects that may affect the technical, legal, operational or economic assumptions underlying the approved feasibility study.

In addition, the regulation simplifies the accelerated VAT refund regime applicable during the exploration stage by reducing the supporting documentation required and eliminating the obligation to notify exploration activities prior to their commencement.

From an environmental perspective, the decree harmonizes the Mining Investment Regime with General Environmental Law No. 25.675 by allowing, subject to the Enforcement Authority's assessment, the mandatory Environmental Insurance to satisfy the environmental remediation provision otherwise required under the mining regime, while preserving the existing mechanism for projects not subject to such insurance requirements.

The new regulation also introduces an annual sworn statement and economic-financial report to be filed electronically through the "*Trámites a Distancia*" (TAD) platform, broadens the concept of regional integration by extending the applicable distance threshold to 500 kilometers, repeals obsolete provisions and empowers the Enforcement Authority to issue complementary regulations within sixty (60) days.

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THE PROVINCE OF RÍO NEGRO FORMALLY ADOPTS THE INCENTIVE REGIME FOR MEDIUM-SIZED INVESTMENTS ESTABLISHED BY NATIONAL LAW NO. 27,802

The Province of Río Negro adopted the Incentive Regime for Medium-Sized Investments, which provides certain tax benefits for productive investments carried out in Argentina by micro, small and medium-sized enterprises. The Province also introduced a simplified procedure for RIMI beneficiaries seeking to access Río Negro's own provincial economic and industrial promotion regime.

By means of Law No. 5,857, published in the Official Gazette of the Province of Río Negro on June 16, 2026 ("**Law 5857**"), the Province of Río Negro formally adopted, in all its terms and conditions, the Incentive Regime for Medium-Sized Investments ("**RIMI**"), established by Law No. 27,802 and regulated by Decree No. 242/2026 of the PEN.

The RIMI aims to promote national and foreign productive investments carried out in Argentina by micro, small and medium-sized enterprises, up to and including Medium-Sized Enterprises Tranche 2. The regime covers investments in new depreciable movable assets (excluding automobiles) and works directly allocated to the development of productive activities in Argentina, excluding financial assets, portfolio investments and inventory. Its main benefits include accelerated depreciation for income tax purposes and the refund of VAT credits generated by productive investments covered by the regime.

To access these benefits, National Law No. 27,802 establishes minimum investment thresholds of USD 150,000 for micro enterprises, USD 600,000 for small enterprises, USD 3,500,000 for Medium-Sized Enterprises Tranche 1, and USD 9,000,000 for Medium-Sized Enterprises Tranche 2.

In addition to adopting the national RIMI, the Province of Río Negro established a simplified procedure for entities that prove their status as RIMI beneficiaries and seek to access the Province's Economic and Industrial Promotion Regime under Law No. 5,766. Under this procedure, the certificate of enrollment in the national RIMI will operate as a document exempting beneficiaries from submitting the documentation required under Law No. 5,766 and its regulations, thereby reducing documentation burdens and facilitating coordination between both regimes in Río Negro. However, this simplification does not exempt or replace compliance with the requirements of the provincial promotion regime.

Law 5857 must be regulated by the Provincial Executive Branch within ninety (90) days from its publication.

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CASE LAW

THE SUPREME COURT DISMISSES ENVIRONMENTAL CLASS ACTION OVER THE NEUQUÉN BASIN

The Supreme Court dismissed the collective environmental damage claim brought against virtually the entire universe of hydrocarbon concessionaires operating in the "Neuquén Basin," holding that the plaintiff failed to identify interjurisdictional collective environmental damage.

On May 21, 2026, the Supreme Court issued its decision in *ASSUPA et al. v. Y.P.F. S.A.* et al. on environmental damage, dismissing the class action filed by the Asociación de Superficiarios de la Patagonia (“**ASSUPA**”). The plaintiff had sued practically the whole country's hydrocarbon industry (essentially every company holding exploration and exploitation concessions in the Neuquén Basin) seeking the integral remediation of alleged collective environmental damage to soil, air, and surface and underground waters, the constitution of the environmental restoration fund provided for under the General Environmental Law, and the adoption of preventive measures.

The Court recalled that, in its 2014 decision, it had circumscribed the object of the proceeding exclusively to cases of collective environmental damage of an interjurisdictional nature, given that matters not exceeding the provincial scope fall under local jurisdiction. On that basis, it held that the plaintiff had merely asserted, in general terms, that all soils, waters, and air in the Basin would be contaminated, without specifying in a circumstantiated manner which soils or water courses were affected, how the contamination would occur within and beyond each concession area, or the magnitude of the alleged alterations.

The Court emphasized that neither the mere aggregation of wells and exploited surfaces per company, nor the fact that the Basin spans more than one province, is sufficient to attribute an interjurisdictional character to the alleged damage. Beyond the mobility that may be attributed to certain substances used in hydrocarbon activity, no evidence had been incorporated to show that they reach other territories with the contaminating characteristics ascribed to them.

Having repeatedly warned the plaintiff about the vagueness of its allegations throughout the lengthy proceeding, the Court concluded that the conditions to advance to the next procedural stage were not met, since no interjurisdictional collective environmental damage could be identified, a necessary precondition to proceed under its restricted and exceptional jurisdiction.

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TAX

DEADLINE SET FOR THIRD INSTALLMENT OF 2026 SUPERVISION FEE

MEM agents must pay the third installment of the Supervision and Control Fee no later than July 21, 2026.

By means of Resolution No. 155/2026, published on the Official Gazette on June 29, 2026 (“Resolution 155”), the ENRGE established that generation, transmission, and distribution agents of the MEM subject to the Supervision and Control Fee must pay the third installment of the 2026 annual charge no later than July 21, 2026.

Resolution 155 specified that the amounts due for this installment are detailed in an attached annex and confirmed that the third and final installment will be adjusted based on the definitive calculation of applicable rates for each company, with payment dates to be set in future administrative acts.

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UPDATED POSTPONEMENT OF INCREASES TO LIQUID FUELS AND CARBON DIOXIDE TAXES

The PEN further deferred the application of the remaining increases to the Liquid Fuels Tax and the Carbon Dioxide Tax, extending the current tax treatment until June 30, 2026.

By means of Decree No. 405/2026, published in the Official Gazette on June 1, 2026 ("**Decree 405**"), the PEN amended Decree No. 617/2025, postponing until July 1, 2026, the application of the remaining updates to the fixed amounts applicable under the Liquid Fuels Tax and the Carbon Dioxide Tax.[10]

Under the current legal framework, the fixed amounts applicable to these taxes are adjusted quarterly based on the Consumer Price Index (IPC) published by INDEC. However, the effective application of these adjustments has been repeatedly deferred through successive decrees. Decree 405 extends the current transitional regime through June 30, 2026, replacing the previous deadline of May 31, 2026.

According to the recitals of the Decree, the measure seeks to preserve the Government's fiscal policy aimed at supporting economic growth while maintaining a sustainable fiscal path by avoiding an immediate increase in the tax burden applicable to gasoline and diesel fuels.

Accordingly, during June 2026 the tax burden applicable to unleaded gasoline, virgin gasoline and diesel oil remains unchanged, with the deferred increases expected to be applied in full beginning July 1, 2026, unless a new deferral is enacted.

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[10] Please refer to MHR's Energy Newsletter: December 2025 for further information on Decree No. 617/2025.

REDUCTION IN EXPORT DUTIES APPLICABLE TO BIODIESEL

Timeline for the progressive reduction of export duties.

By means of Decree No. 423/2026, published in the Official Gazette on June 3, 2026 ("**Decree 423**") the PEN established a reduction in export duties for certain grains and by-products, including, among others, biodiesel.

Decree 423 established that the reduction is due to the new regulations applicable in the markets where the goods are exported and the technological advances in the production of biofuels. Decree 423 also clarifies that the reduction of the export duty rate (to levels equivalent to those established for oil exports) includes specific products under the biodiesel tariff code: namely, those derived from rapeseed, safflower, brassica carinata, and camelina sativa oils, with the aim of expanding and diversifying export markets.

The new regulation establishes a 0% export duty for biodiesel obtained from safflower, rapeseed, brassica carinata, or camelina sativa oil, as well as other biodiesels that do not contain soybean oil biodiesel (classified under tariff code NCM 3826.00.00) (the "Biodiesels").

The remaining goods included under NCM 3826.00.00 are subject to a 21% export duty rate in 2026, which will be gradually reduced according to the following progressive schedule:

	BIODIESELS	REST OF GOODS UNDER NCM 3826.00.00
January 2027	0%	20.75%
February 2027	0%	20.50%
March 2027	0%	20.25%
April 2027	0%	20%
May 2027	0%	19.75%
June 2027	0%	19.50%
July 2027	0%	19.25%
August 2027	0%	19%
September 2027	0%	18.75%
October 2027	0%	18.50%
November 2027	0%	18.25%
December 2027	0%	18%

	BIODIESELS	REST OF GOODS UNDER NCM 3826.00.00
January 2028	0%	17.50%
February 2028	0%	17%
March 2028	0%	16.50%
April 2028	0%	16%
May 2028	0%	15.50%
June 2028	0%	15%
July 2028	0%	14.50%
August 2028	0%	14%
September 2028	0%	13.50%
October 2028	0%	13%
November 2028	0%	13%
December 2028	0%	13%

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