

OFAC General License 52 Allows U.S. Companies to Re-Enter Venezuelan Energy Market

March 19, 2026

PRACTICES Latin America Caribbean, Oil and Gas

In previous alerts released on [Feb. 5](#) and [Feb. 19, 2026](#), we shared developing legal shifts and investment signals indicating that the United States had started to ease restrictions on the Venezuelan energy sector. That opening has widened significantly.

On March 18, 2026, the U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC) issued [General License 52 \(GL 52\)](#). GL 52 broadly authorizes established U.S. entities to engage in transactions with Petróleos de Venezuela, S.A. (PdVSA) that were previously prohibited under executive authority — subject to certain conditions and exclusions.

Bottom line: GL 52 allows U.S. companies to re-enter Venezuela's oil and gas sector without obtaining specific OFAC licenses — provided they comply with certain contractual, payment and counterparty requirements. This regulatory movement is designed to foster direct, new investment in Venezuela by U.S. companies.

GL 52 is a significant shift in U.S. sanctions policy toward Venezuela's energy sector. It opens the door to commercial activity, such as entry into new investment contracts and formation of joint ventures and other entities, that had been broadly prohibited — while preserving strict controls on how transactions are structured and executed. Companies that implement compliant frameworks can move quickly into the market. Companies that do not will remain exposed to sanctions risk despite the new authorization.

Among other permissions, GL 52 now allows established U.S. entities to:

- Engage in the lifting, exportation, reexportation, sale, resale, supply, storage, marketing, purchase, delivery, or transportation of Venezuelan oil or petroleum products of Venezuelan-origin oil and petroleum products
- Enter into new investment contracts for exploration, development, or production activities in the oil, gas, or petroleum products sectors of Venezuela; and
- Form joint ventures or other entities in Venezuela related to such activities.

Thus, companies across the energy sector can enter contract vehicles — such as master services agreements (MSAs) — provided that those services sufficiently relate to the newly authorized transactions, exercise existing commercial rights, and start investing in new commercial opportunities. Indeed, there are references in the press about such developments already occurring.

While this is a significant shift, there remain certain restrictions covering, most notably:

- Transactions related to bonds and debt issued by PdVSA
- Transactions involving equity interests in PdVSA and its subsidiaries

- Transactions involving the transfer of equity interest in PDV Holding, CITGO Holding, or CITGO Petroleum Group; and
- Transactions other than with an “established U.S. entity” as of Jan. 29, 2025.

Additionally, the general prohibitions seen in previous licenses related to non-commercial terms, payments in gold or debt swaps, digital currency, prohibited countries (Iran, North Korea, Cuba, Russia, and China), blocked property or blocked vessels still apply. Of course, other U.S. compliance regimes such as the False Claims Act (FCA) and Foreign Corrupt Practices Act (FCPA) remain in effect.

Besides OFAC’s restrictions, there are commercial realities that require experienced counsel before planning a commercial return to the energy sector in Venezuela.

These include assistance with:

- Government regulatory approvals, both in the United States and Venezuela
- Developing local infrastructure
- Access to local supplies and resources
- Transportation and export infrastructure
- Updating contract terms to reflect new regulatory requirements related to U.S. law and allowable dispute resolution mechanisms
- Enhanced counterparty diligence including KYC approvals
- Internal process development
- Institution of payment controls
- Preparation of detailed government reports
- Review of existing and planned transactions for compliance (including environmental legal, technical and commercial reviews)
- Ongoing compliance obligations including but not limited to the FCA and FCPA

This represents a significant shift from the prior sanctions posture, where activities related to transportation, direct investment contracting and the formation of joint ventures generally required specific OFAC licenses.

GL 52 creates a clear, actionable pathway for established U.S. entities to re-enter Venezuela’s energy sector without obtaining specific OFAC licenses. That opportunity is immediate — but highly structured. GL 52 does not entirely lift sanctions; it widens and sets the conditions under which activity is permitted.

Companies that align their contracts, payment flows and diligence processes now will be positioned to act more quickly and confidently within OFAC’s parameters.