



Michelle Lujan Grisham
Governor

Howie C. Morales
Lt. Governor

December 23, 2019

Zainab Naqvi
El Paso Natural Gas Company, LLC.
1001 Louisiana, Suite 1000
Houston, TX 77002

Sent by electronic mail to: zainab_naqvi@kindermorgan.com

Subject: Request for Additional Information for Four-Factor Analyses under the Regional Haze Program

Dear Ms. Naqvi:

This letter requests additional information and analysis for the Pecos River Compressor Station. A four-factor analysis report was received by the New Mexico Environment Department (NMED) Air Quality Bureau on November 1, 2019. Pursuant to NMED's [Regional Haze Guiding Principles](#), the four-factor analysis must consider new ideas that potentially offer better solutions to problems and must evaluate the newest engineering methods and technology advances in potential control measures.

Based on our initial review, the NMED requires additional information, analyses and clarifications on your four-factor analysis as follows:

1. **Natural Gas Fired Regenerative Cycle Turbines:** Please provide the following information regarding potential control measures for nitrogen oxide (NO_x) emissions from Units A-01, A-02, and A-03.
 - i. Provide details of the training curriculum and schedule for employees that ensure Good Combustion Practices utilized continue to be implemented at the plant. Clarify whether these best practices are fully optimized or conform to permit conditions alone.
 - ii. Provide documentation of your communications with GE that supports the conclusion that Lean Head End Liner, improved combustion technology and water injection is not technically feasible for these units.
 - iii. Provide the documentation to support El Paso Natural Gas's (EPNG's) cost estimates for building modifications required to install and house a SCR system.
 - iv. Please expand on the difficulties that may result due to the age of equipment and the availability of control equipment that led to using a retrofit difficulty factor of 1.5.
 - v. Provide a discussion regarding the varying operating hours across the three units and compare 2016 operating hours to the unit's five year average (i.e., 2014-2018) to evaluate if this is a representative scenario for estimating cost of compliance.
 - vi. Provide a discussion explaining the difference between the emissions used to calculate costs (i.e., 2016 stack test data and operating hours) and the actual emissions reported to the department in 2016. The cost calculations use NO_x emissions of 51.39 tons/year

NEW MEXICO ENVIRONMENT DEPARTMENT

525 Camino de los Marquez, Suite 1
Santa Fe, New Mexico 87505
Phone (505) 476-4300 Fax (505) 476-4375
www.env.nm.gov



James C. Kenney
Cabinet Secretary

Jennifer J. Pruett
Deputy Secretary

(tpy), 95.62 tpy, and 87.19 tpy whereas NOx emission were reported to NMED as 132.29 tpy, 190.24 tpy, and 172.62 tpy.

- vii. Provide the electronic spreadsheets used for control technology cost calculations and annual energy consumption.

Please note that per EPA's Guidance on Regional Haze State Implementation Plans for the Second Implementation Period (August 20, 2019), "as part of meeting the requirement of the Regional Haze Rule for the state to document the cost and engineering information on which the State is relying every source-specific cost estimate used to support an analysis of control measure must be documented in the SIP". If you feel that your supplemental information should be classified as confidential business information (CBI), it will need to be reviewed and approved as such by NMED and EPA. Submit CBI with the word 'confidential' included in the electronic file name and on each page of the document. Do not combine non-confidential business information and CBI in the same files. Also, the claimant must satisfy the conditions in 20.2.1.115.B(3)(a)-(d) NMAC when the CBI is submitted. Until NMED and EPA determines if the information qualifies as CBI, the information will not be disclosed to anyone other than those listed in 20.2.1.115 NMAC.

NMED respectfully requests that your company electronically submit the additional information on four-factor analysis to Mark Jones at mark.jones@state.nm.us and myself at kerwin.singleton@state.nm.us as soon as possible. Please contact NMED if you have questions about the additional information request. We encourage your questions in order to help expedite the technical analysis required under the Regional Haze Program. Staff would be happy to meet with you in person to discuss these requirements in more detail. Likewise, staff may further contact you with questions or require additional information during its review of your submittals.

Thank you for your assistance in this matter. If you have questions or need clarification, please contact me at (505) 476-4350, or Mark Jones at (505) 566-9746.

Sincerely,

Kerwin C. Singleton
Planning Section Chief

xc: Adam Erenstein, Trinity Consultants, aerenstein@trinityconsultants.com
Michael Celente, Trinity Consultants, mcelente@trinityconsultants.com
Rachel Reese, Trinity Consultants, rreese@trinityconsultants.com