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December 23, 2019

Ms. Zainab Naqvi
El Paso Natural Gas Company
8645 Railroad Drive
El Paso, TX 79904

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 for the El Paso Natural Gas – Washington Ranch Storage Facility Four-Factor Analysis report that was received by the New Mexico Environment Department (NMED) Air Quality Bureau (AQB) 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.

Please provide the following information for all engines that were evaluated in the Washington Ranch Storage Facility Four-Factor Analysis for nitrogen dioxide (NO_x):

1. Consider Good Combustion Practices (GCP) and routine maintenance as controls and provide the details of a maintenance schedule, employee training and operating procedures used to achieve emissions reductions.
2. Consider and include a discussion on the feasibility and cost of technology that limits engine capacity to reduce NO_x emissions. Also evaluate limitations on engine operating hours or shutting down engines that are no longer needed to reduce total NO_x emissions.
3. Consider and include a discussion of variations of Clean Burn Technology (CBT) used to reduce NO_x emissions that may be more effective than the existing package if available. Please include cost and efficiencies in analysis. Show documentation of vendor quotes with cost and control efficiency.
4. Please verify and provide documentation that control systems have not yet been developed for selective catalytic reduction (SCR) controls that can handle variable load engines. This appears to be one main reason that SCR has not been implemented on two-stroke lean burn (2SLB) internal combustion engines in oil and gas midstream operations.
5. Please consider and include a discussion on the feasibility of replacing natural gas-fueled engines/turbines with commercial electric powered compressors.

6. Provide vendor specifications that include the cost information, recommendations, and equipment specifications for the engine control estimates. This information is required to complete review of the analyses.
7. Provide any electronic spreadsheets used for control technology calculations.

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 submit the additional information on four-factor analysis electronically as soon as possible to Mark Jones at mark.jones@state.nm.us and myself at kerwin.singleton@state.nm.us. 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 Singleton
Planning Section Chief