



Michelle Lujan Grisham
Governor

Howie C. Morales
Lt. Governor

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

December 23, 2019

Mr. Tony Hines
IACX Roswell, LLC
5001 LBJ Freeway, Suite 300
Dallas TX, 75244

Sent by electronic mail to: tonyhines@iacx.com

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

Dear Mr. Hines:

This letter requests additional information regarding the Bitter Lake Compressor Station's Four-Factor Analysis report, received by the New Mexico Environment Department (NMED) Air Quality Bureau (AQB) on October 31, 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 the Bitter Lake Compressor Station report.

1. Provide the details regarding Good Combustion Practices (GCP) and the routine maintenance schedule and procedures that are currently used to mitigate nitrogen oxide (NO_x) emissions that are employed as the base case.
2. Please provide an analysis of the technical feasibility of Non-Selective Catalytic Reduction (NSCR) as a retrofit control option for all engines that were evaluated in the Bitter Lake Compressor Station four-factor analysis for NO_x. Should it be determined that NSCR is technically feasible, please complete a four-factor analysis for this technology.
3. Please consider and include a discussion on the feasibility of replacing natural gas-fueled engines/turbines with commercial electric powered compressors.

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 : MacKenzie Russell - Consultant, Trinity Consultants, mrussell@trinityconsultants.com
Jane Romero-Kotovskyy- Senior Consultant, Trinity Consultants, jromero@trinityconsultants.com