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July 18, 2019

Mr. James Lieb
Enterprise Field Services
PO Box 4324
Houston, TX 77210-4324

Subject: Notification of Requirement to Perform a Four-Factor Analysis on Control Measures Under the Clean Air Act Regional Haze Program

Dear Mr. Lieb:

This letter is to inform you that the New Mexico Environment Department (NMED) has identified the Chaco Gas Plant and the Blanco C&D Compressor Station located in San Juan County, New Mexico as facilities subject to a four-factor reasonable progress analysis under the federal Clean Air Act, 42 U.S.C. § 7491, and implementing regulations at 40 CFR §§ 51.300 to 51.309 (Regional Haze Rule).

The NMED has identified twenty-four (24) Title V permitted facilities across the state that may potentially have an impact on visibility at Federal Class 1 Areas protected by the Regional Haze Rule. This determination was based on a methodology developed by the Western Regional Air Partnership (WRAP), consistent with guidance from the U.S. Environmental Protection Agency (EPA).

The four-factor analysis is necessary for NMED to develop a long-term strategy to address regional haze visibility impairment. The four-factor analysis considers emission reduction measures based on (1) the cost of compliance; (2) the time necessary for compliance; (3) the energy and non-air quality environmental impacts of compliance; and (4) the remaining useful life of an existing source subject to this requirement. We request that you analyze all the identified control measures in terms of the four factors specified in 40 CFR § 308(f)(2)(i), consistent with relevant EPA guidance.

Therefore, in accordance with the Regional Haze Rule, NMED requests that your company perform a four-factor analysis of all potential new control measures for nitrogen oxides (NO_x) and sulfur dioxide (SO₂) on individual equipment that has the potential to emit (PTE) greater than ten (10) pounds per hour of NO_x or SO₂. A separate analysis is required for each pollutant with a PTE greater than ten (10) pounds per hour of NO_x or SO₂. Note that equipment exempt under 20.2.72 NMAC or insignificant under 20.2.70 NMAC is not required to undergo the analysis. Likewise, individual equipment of the same source category is not required to be aggregated in order to determine if an analysis is required. Individual emission points that total less than five (5) tons per year for either pollutant do not need to undergo this analysis.

Because the Blanco C&D Compressor Station is jointly permitted with the Harvest Pipeline - San Juan Gas Plant and the El Paso Natural Gas Company – Blanco Compressor Station A under NSR Permit No.

0613-M12, NMED requests a combined four-factor analysis for these three facilities. The four-factor analysis for the Chaco Gas Plant should be submitted as a separate report. NMED respectfully requests that your company submit a report containing the complete four-factor analysis no later than November 1, 2019. Prior to that date, NMED plans to hold a teleconference on or about September 4th to review progress in identifying technically feasible control measures and conducting the four-factor analysis for each subject source.

Following submission of the facility's report, NMED will determine whether any of the identified control measures are cost effective and technically feasible for the facility in terms of the four-factor analysis. Any measures that are cost effective and technically feasible will be submitted to WRAP along with data quantifying the projected emission reductions that will result by calendar year 2028 from implementation of these measures. The modeling results will determine if projected emissions reductions will result in visibility improvement to the affected Class 1 area. If visibility improvements are not predicted by the model, the control measures will not be recommended.

NMED will incorporate the identified cost-effective measures into a proposed Regional Haze State Implementation Plan, which NMED will bring to the Environmental Improvement Board (Board). NMED will petition the Board for a rulemaking hearing on the proposed SIP in the first half of calendar year 2021, in order to meet the federal regulatory deadline of July 31, 2021 for submittal to the EPA.

Please contact NMED if you have questions about the methodology for conducting a four-factor analysis under the Regional Haze Rule. We encourage your questions in order to help expedite the technical analysis required under the Rule. Staff would be happy to meet with you in person to discuss these requirements in more detail. NMED has developed a website for Regional Haze with important links to EPA's Cost Control Manual and other technical information that may assist in these efforts.

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

Sincerely,



Liz Bisbey-Kuehn
Chief, Air Quality Bureau

Attachments: 1) WRAP Control Measures Analysis Protocol
2) List of New Mexico Title V facilities identified as having potential visibility impacts at Federal Class 1 Areas

Attachment 2. Title V sources required to conduct a four-factor analysis of control measures under the 2016 Regional Haze Rule.

Title V Facilities w/ Q/d > 5.5	Q/d	Class I area	Company Name
Cunningham Station	7.72	Carlsbad NP	Xcel Energy
Prewitt Escalante Generating Station	26.1	San Pedro Parks WA	Tri-State Generation and Transmission Association
Roswell Compressor Station No9	7.6	Salt Creek WA	Transwestern Pipeline
Mountainair No7 Compressor Station	5.7	Bosque del Apache WA	
Monument Gas Plant	20.4	Carlsbad NP	Targa Midstream Services
Eunice Gas Processing Plant	13.0	Carlsbad NP	
Saunders Gas Plant	11.7	Salt Creek WA	
San Juan Generating Station	461.0	Mesa Verde NP	Public Service Co. of New Mexico
Indian Basin Gas Plant	9.4	Carlsbad NP	Oxy USA
Bitter Lake Compressor Station	50.2	Salt Creek WA	IACX Roswell, LLC
Kutz Canyon Processing Plant	10.3	Mesa Verde NP	Harvest Four Corners, LLC
Harvest Pipeline - San Juan Gas Plant	8.3	Mesa Verde NP	
Jal No3 Gas Plant	20.5	Carlsbad NP	ETC Texas Pipeline, Ltd.
Chaco Gas Plant	28.2	Mesa Verde NP	Enterprise Field Services
Blanco Compressor C & D Station	7.8	Mesa Verde NP	
South Carlsbad Compressor Station	5.9	Carlsbad NP	
Washington Ranch Storage Facility	23.5	Carlsbad NP	El Paso Natural Gas Company
Pecos River Compressor Station	13.9	Carlsbad NP	
Blanco Compressor Station A	5.6	Mesa Verde NP	
Eunice Gas Plant	18.4	Carlsbad NP	DCP Operating Company, LP
Linam Ranch Gas Plant	7.6	Carlsbad NP	DCP Midstream
Artesia Gas Plant	5.7	Carlsbad NP	
Denton Gas Plant	7.6	Salt Creek WA	Davis Gas Processing
Rio Grande Portland Cement Plant*	16.0	Bandelier WA	

*Located in Bernalillo County outside of NMED Jurisdiction.

