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**GHG Reporting Stakeholder Meeting**  
**March 27, 2007**

**Notes from Electrical Generating Unit Breakout Session**  
**2:30 – 4 pm**

**Participants:**

Luis Ito, El Paso Electric Corporation; Martin Rehm, Tri-State G&T; Jim Behnken, JGB Consulting/Tri-State; Paul Leonis, NMPRC; Jane Yee, NMPRC; Jack Ihle, Xcel Energy; Ron Dutton, Xcel Energy; Nancy Norem, PNM; Chris Albrecht, COA/AQD; Wayne Leipold, Phelps-Dodge Miami; Walt Whetham, LANL; Jackie Hurtle, LANL; Mark Jones, NMED-AQB; Andy Berger, NMED-AQB; Rita Trujillo, NMED-AQB

**Focus on Form of Mandatory GHG reporting: Reporting threshold, protocol & emissions calculations**

**Agenda:**

- Phase-in schedules
  - Adequate protocol must be available
  - Only CO<sub>2</sub>? Other GHG?
- Emissions calculations
  - Evaluation of CCAR protocol, suggestions of others to consider
  - CEMS vs. fuel use, when both are available
  - Reporting of biomass combustion emissions (reported separately)
  - Approach for allocating emissions from combined heat and power
- Times and locations for future workgroup meetings

**Phase-in schedules:**

1. What GHG emissions will be part of mandatory reporting?
  - a. EGU/Industry favored reporting only CO<sub>2</sub> Direct Emissions from Stationary Combustion at Title V electricity generation units including combined heat and power facilities for first phase of mandatory reporting
  - b. Reporting would be annual as part of annual Title V emission inventory
  - c. Other direct combustion related GHG emissions from Stationary Combustion such as CH<sub>4</sub> and N<sub>2</sub>O would possibly be a next phase at later date
  - d. Reporting GHG emissions associated with process & fugitive was thought to be unnecessary and to fit in de minimis category at this time
  - e. Adequate protocol must be available?
    - i. It was suggested that we use an existing protocol for doing this. Group emphasized that CEMS CO<sub>2</sub> data would be best to use where available.
    - ii. EPA Acid Rain or state protocol for CEMS measurements adequate where available
    - iii. WRI Greenhouse gas accounting and reporting standard (Xcel energy had already done some GHG inventory work with this protocol) was discussed briefly as one of the most adequate / established reporting protocols. This was thought to have been used to help develop the CCAR protocol.
    - iv. Or California Climate Action Registry (CCAR) protocol -- only Ch. 5 direct combustion GHG section

- v. Some power companies had already done some internal GHG emissions inventory work
  - vi. **Action Item: To put a copy of WRI protocol side by side with CCAR protocol on the GHG R&R website.**
- f. Concerning protocol: whatever protocol selected recommended NM GHG Mandatory reporting would follow parts of protocol that pertained to CO2 emissions from Direct Combustion Sources at facility only. Main aspect of protocol that would be used is "what to do if no CEMS data?" If no CEMS, use fuel data and emissions factors according to an agreed upon established set of emissions factors for fuel data.
  - g. For improvement of NM GHG emissions inventory it would be great if we could lower the threshold for reporting and require all generators to report; however, there are limited resources to do this.
2. What threshold for reporting? Who will be required to report?
    - a. Current & future Electricity generating units(EGUs) & Combined Heat & Power(CHP) that report under the Title V program will be required to report (general agreement)
    - b. Some concern here about developing a full list of these facilities. **Action Item: Prepare List of Title V sources that would be required to report under GHG R&R Mandatory reporting, post on website to be reviewed to make sure it is complete.** One of the concerns was that some plants generate their own electricity and do not sell to grid so may not be classified as EGUs. Some CHP facilities are combined with industry or oil & gas treatment plants. General consensus was that we develop list of all Title V EGUs and CHP facilities. We can use this to cross check with Oil & Gas to make sure there is not double counting.

#### **Emissions calculations:**

1. Evaluation of CCAR protocol, suggestions of others to consider. See discussion above.
2. CEMS versus Fuel use (when both are available): See discussion above.
3. Reporting of biomass combustion emissions (reported separately). Currently there is only one proposed biomass plant in NM. So this is not really an issue. For future biomass plants, under GHG emissions mandatory reporting rule, Title V biomass plants would report. A footnote would accompany the reporting for biomass plants noting that a percentage of the CO2 emitted from the plant was removed from the atmosphere in the lifecycle of the biomass.
4. Approach for allocating emissions from combined heat and power?
  - a. Definition: A combined heat and power (CHP) system, commonly referred to as "co-generation", multiple forms of energy (often electricity and steam) are generated simultaneously in an integrated system, from the same input fuel supply. GHG emissions from a CHP plant occur from the combustion of fossil fuels (input fuel) in the CHP plant to generate the multiple energy streams. These GHG emissions include CO2, CH4, and N2O. There are several different configurations for these. Example. Williams Field Services Milagro Gas Treatment Plant and Cogeneration Facility.
  - b. Approach is that combined heat and power is still generation. All Title V generation should be reported.

#### **Times and locations for future workgroup meetings**

Next meeting planned for April 12, 2007 (MDT) @ 9 AM via conference call. Need to set-up a conference call line & send out a notice

#### **Action Items:**

1. Post on GHG R&R website two protocols: WRI & CCAR
  - (1) WRI Greenhouse Gas Accounting & Reporting Standard:  
<http://www.ghgprotocol.org/DocRoot/7e9fsv1gVKekh7BFhqo/ghg-protocol-revised.pdf>

(2) California Climate Action Registry Protocol  
<http://www.climateregistry.org/PROTOCOLS/PUP/>

2. Develop complete list of Title V sources that would report for power generation
3. Clearly define what combined heat and power is? (see notes above)
4. Check to see why Milagro was not on list of Title V, and why Maddox was included under compressor stations.

**Next:**

Next meeting planned for April 12, 2007 (MDT) @ 9 AM via conference call. Need to set-up a conference call line & send out a notice