

From: [Hollenberg, Cindy, ENV](#)
To: Weiwen_daly@kindermorgan.com
Cc: [Kuehn, Elizabeth, ENV](#)
Subject: Alternative Emissions Standards Proposal received December 2, 2022
Date: Tuesday, December 20, 2022 4:55:00 PM
Attachments: [image001.png](#)

Mr. Daly,

The New Mexico Environment Department, Air Quality Bureau received your proposal for "Alternative Emission Standards" (AES) on December 2, 2022. I apologize that I did not look at this sooner; I was out of the country!

I have reviewed your proposal and have determined that we need additional information before we post to our web site to start the process for public comment and analysis for approval purposes:

1. Please provide a demonstration that your fleet cannot meet the emissions standards through an Alternative Compliance Plan, as required by 20.2.50.113.B(11)(b) NMAC. Your proposal claims this, but the demonstration has not been made. This should include actual calculations that show, for example, why total allowable emissions for your fleet cannot meet the emission standards pursuant to 20.2.50.113.B(10) NMAC.
2. The emission standards found in 20.2.50.113 NMAC are in units of ppmvd @15% O₂. To compare your proposed AES with what is in the rule, we need equivalent units. Please provide your proposed AES in these units, showing the calculations used to convert.

Thank you. We look forward to receiving this additional information to move the process forward.

Regards,
Cindy

PS: You do not need additional work to be done by the independent 3rd party. We are satisfied with the memorandum and do not require that they also certify the additional information.

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