



El Paso Natural Gas
Company, L.L.C.
a Kinder Morgan company

January 28, 2025

Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

Attention: Ms. Debbie-Anne A. Reese, Secretary

Re: El Paso Natural Gas Company, L.L.C.;
Docket No. CP24-520-000
Responses to Data Request - OEP/DG2E/Gas Branch 2

Dear Ms. Reese:

On January 16, 2025, El Paso Natural Gas Company, L.L.C. ("EPNG") received a data request ("Data Request") from the Office of Energy Projects ("OEP") seeking information pertaining to the proposed Maricopa Lateral Expansion Project. EPNG is herein filing its response with the Federal Energy Regulatory Commission ("Commission").

Description of Proceeding

On September 17, 2024, EPNG submitted a Request for Prior Notice Authorization Pursuant to Blanket Certificate in the above-referenced docket seeking authorization to construct, install and operate a new compressor station and appurtenances to be located in Yavapai County, Arizona as part of its Maricopa Lateral Expansion Project.

Description of Information Being Filing

EPNG is herein submitting its response to the Data Request No. 3.¹

Filing Information

EPNG is e-Filing this letter and its responses with the Commission's Secretary in accordance with the Commission's Order No. 703, *Filing Via the Internet*, guidelines issued on November 15, 2007 in Docket No. RM07-16-000.

¹ EPNG submitted a response to Data Request No. 1 on January 23, 2025 and Data Request No. 2 on January 24, 2025. With the submittal of this response, EPNG has provided responses to all the Data Request questions issued on January 16, 2025.

Certificate of Service

I hereby certify that I have this day caused a copy of the foregoing documents to be served upon each person designated on the official service list compiled by the Commission's Secretary in this proceeding in accordance with the requirements of Section 385.2010 of the Federal Energy Regulatory Commission's Rules of Practice and Procedure.

Dated at Colorado Springs, Colorado as of this 28th day of January 2025.

/s/

Francisco Tarin

Two North Nevada Avenue
Colorado Springs, Colorado 80903
(719) 667-7517

STATE OF COLORADO)
)
COUNTY OF EL PASO)

FRANCISCO TARIN, being first duly sworn, on oath, says that he is the Director of the Regulatory Department of El Paso Natural Gas Company, L.L.C.; that he has read the foregoing Response filed on January 28, 2025, to the Office of Energy Projects' Data Request dated January 16, 2025 in Docket No. CP24-520-000, that as such he is authorized to verify the Response, that he is familiar with the contents thereof; and that the matters and facts set forth therein are true to the best of his information, knowledge and belief.


Francisco Tarin

SUBSCRIBED AND SWORN TO before me, the undersigned authority, on this 28th day of January 2025.


Savannah Ekengren
Notary Public, State of Colorado
My Commission Expires: November 26, 2028



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3. Provide an alternatives analysis for the compressor station site locations suggested by commentors that were identified in question 1 including 1) the Hydraulically Optimal location, 2) the Drake Cement Plant, and 3) a site one mile north of the preferred location that Haystack Ranches Community. The analysis should include a table which compares/contrasts each location's characteristics (environmental, engineering, economic) with the proposed aboveground facility site, including:
- a. site acres (both temporary and permanent acres) and type of land affected;
 - b. whether the site satisfies required hydraulics;
 - c. whether the site is reasonably available for purchase or lease or requires a restricted easement;
 - d. whether the site affects any special or sensitive resources;
 - e. length of access driveway required;
 - f. acres of any prime farmland;
 - g. acres of forest cleared;
 - h. number of noise sensitive areas (NSA) within 1 mile and distance to nearest
 - i. number of environmental justice block groups affected;
 - j. turbine/engine/motor horsepower amount;
 - k. gas cooling/heating;
 - l. whether visual/noise screening is present;
 - m. length of electric power line or other non-jurisdictional facilities necessary to operate the project;
 - n. length of associated pipeline lateral and suction/discharge line;
 - o. topography and geological hazards;
 - p. number of waterbodies and acres of wetlands affected; and
 - q. floodplain designation.

Response:

The compressor station sites considered here are: (1) the Hydraulically Optimal Site, (2) the Drake Site, (3) the North Site, and (4) the Preferred Site. EPNG would require approximately 7 acres at each site for its facilities. All sites are located along EPNG's Line No. 1203 (the "Maricopa Lateral").

As noted in Table 1 below, the Drake Site is not hydraulically viable. A compressor station at this location would require a design discharge pressure that exceeds the desired maximum operating pressure of the Maricopa Lateral necessary to meet downstream customer delivery obligations and other operational requirements. However, as requested, EPNG has evaluated this site.

All three alternative sites (*i.e.*, the Hydraulically Optimal Site, the Drake Site, and the North Site) are within undisturbed pinyon-juniper woodlands, while the Preferred Site consists of sparse grasslands. All four sites are within the same Minority and Low-Income Environmental Justice block.

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(1) *Hydraulically Optimal Site:*

- The site is located 4.7 miles north of the Haystack Ranch Community’s northern boundary, on lands managed by the U.S. Forest Service (“USFS”) within the Prescott National Forest.
- No Noise Sensitive Areas (“NSAs”) are within one mile of the site, and the nearest NSA is approximately 3.8 miles southwest of the site.
- Due to distance, topography, and vegetation, visual and noise impacts to the nearest NSA are unlikely.
- The Arizona Geological Survey identifies a high potential for landslides in the area.
- Access would require building a 5.4-mile road on lands managed by both the Arizona State Land Department (“ASLD”) and USFS, crossing seven potential waterbodies (Riverine; Intermittent; Streambed; and Seasonally or Intermittently Flooded). Additionally, 7.2 miles of new powerline would be needed, primarily through undisturbed pinyon-juniper woodlands within the Prescott National Forest.
- A backpressure valve would need to be installed on the Maricopa Lateral approximately 2,100’ south of the Haystack Ranch Community’s southern boundary. The valve facilities would require an approximate 200’ by 200’ construction workspace along with an approximate 250’ long access road. Once in service, EPNG would retain an approximate 100’ by 100’ fenced-in area to secure the aboveground valve facilities. These facilities would likely have an additional impact on environmental, visual, noise, and other resources. This response does not include an analysis of such additional impacts or identify the additional NSAs that would be affected by such facilities.

(2) *Drake Site:*

- As mentioned, the site is not hydraulically viable.
- The site is located 13.8 miles north of the Haystack Ranch Community’s northern boundary, on lands managed by the USFS within the Prescott National Forest.
- The nearest NSA to the site, the Drake Cement Plant, is within 0.5 miles of the site.
- Visual and noise impacts could occur at the Drake Cement Plant.
- The Arizona Geological Survey does not indicate a landslide risk here.
- Access would require using an existing USFS road within the Prescott National Forest, possibly requiring improvements to a 0.3-mile road.

(3) *North Site:*

- The site is located 2.6 miles north of the Haystack Ranch Community’s northern boundary, on lands managed by the ASLD.

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- No NSAs are within one mile of the site, and the nearest NSA is approximately 2.6 miles south of the site.
- Distance, topography, and vegetation suggest minimal noise and visual impacts at the nearest NSA.
- The site is crossed by a Riverine Intermittent Streambed wash.
- The site is not Prime Farmland and has a low-to-no landslide potential, according to the Arizona Geological Survey.
- Access would require upgrading an existing 2.15-mile road and installing 3.9 miles of new powerline, in each case, crossing ASLD and USFS lands.
- Development would require a 42-inch foreign line crossing to connect the Haystack Compressor Station's suction and discharge lines to the Maricopa Lateral.
- A backpressure valve would need to be installed on the Maricopa Lateral approximately 2,100' south of the Haystack Ranch Community's southern boundary. The valve facilities would require an approximate 200' by 200' construction workspace along with an approximate 250' long access road. Once in service, EPNG would retain an approximate 100' by 100' fenced-in area to secure the aboveground valve facilities. These facilities would likely have an additional impact on environmental, visual, noise, and other resources. This response does not include an analysis of such additional impacts or identify the additional NSAs that would be affected by such facilities.

(4) Preferred Site:

- The site is located 0.5 miles north of the Haystack Ranch Community's northern boundary, on lands managed by the ASLD.
- The nearest NSA is 0.5 miles from the site.
- Due to distance and topography, noise and visual impacts to the nearest NSA are unlikely.
- The site is not Prime Farmland, and the Arizona Geological Survey indicates a low-to-no landslide potential.
- Access will require upgrading an existing 0.5-mile road, with 2.5 miles of new powerline construction, partly on ASLD lands.

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Table 1: Alternative Site Analysis

	North Site	Hydraulically Optimal Site	Drake Site	Preferred Site
a. Site acres and land type affected	7 acres (pinyon-juniper woodlands)	7 acres (pinyon-juniper woodlands)	7 acres (pinyon-juniper woodlands)	7 acres (sparse grasslands)
(i) Additional acres required for access road* and powerline and land type affected	7.8 acres (5.1 acres of sparse grasslands and 2.7 acres of pinyon-juniper woodlands)	19.6 acres (5.1 acres of sparse grasslands and 14.6 acres of pinyon-juniper woodlands)	1.1 acres (all pinyon-juniper woodlands)	1.8 acres (all sparse grasslands)
(ii) Acres of public lands affected	<ul style="list-style-type: none"> • 12.1 acres on ASLD lands • 2.7 acres within the Prescott National Forest 	<ul style="list-style-type: none"> • 5.1 acres on ASLD lands • 21.6 acres within the Prescott National Forest 	<ul style="list-style-type: none"> • 8.1 acres within the Prescott National Forest 	<ul style="list-style-type: none"> • 8.8 acres on ASLD lands
b. Hydraulically suitable	Yes	Yes	No	Yes
c. Available for purchase or lease or requires a restricted easement (EPNG estimates that a USFS easement would require 12-18 months to obtain and an ASLD easement would require 12 months to obtain)	Requires: <ul style="list-style-type: none"> • a compressor station site lease from the ASLD • a road easement from the ASLD and the USFS • a powerline easement from the ASLD and the USFS 	Requires: <ul style="list-style-type: none"> • a compressor station site lease from the ASLD • a road easement from the ASLD and the USFS • a powerline easement from the ASLD and the USFS 	Requires: <ul style="list-style-type: none"> • a compressor station site lease from the USFS • a road easement from the USFS • a powerline easement from the ASLD and the USFS 	Requires: <ul style="list-style-type: none"> • a compressor station site lease from the ASLD • a road easement from the ASLD • a powerline easement from the ASLD
d. Affects special or sensitive resources	<u>IPAC review:</u> Mexican Wolf, Yellow-billed cuckoo, Gila Chub, Gila Topminnow, Gila Trout, Loach Minnow, Spikedace, Monarch Butterfly, Suckley's Cuckoo Bumble Bee	<u>IPAC review:</u> Mexican Wolf, Yellow-billed cuckoo, Gila Chub, Gila Topminnow, Gila Trout, Loach Minnow, Spikedace, Monarch Butterfly, Suckley's Cuckoo Bumble Bee	<u>IPAC review:</u> Mexican Wolf, Yellow-billed cuckoo, Southwestern willow Flycatcher, Gila Chub, Gila Topminnow, Loach Minnow, Spikedace, Monarch Butterfly, Suckley's Cuckoo Bumble Bee	<u>IPAC review:</u> Yellow-billed cuckoo, Southwestern willow Flycatcher, Gila Chub, Gila Topminnow, Gila Trout, Loach Minnow, Spikedace, Monarch Butterfly, Suckley's Cuckoo Bumble Bee
e. Length of access road***	2.15 miles	5.4 miles	0.0 miles	0.5 miles
f. Prime farmland (acres)	Not prime farmland (NRCS 2025)	No soils data available	No soils data available	Not prime farmland (NRCS 2025)
g. Forest land cleared (acres)	9.7 acres	21.6 acres	7 acres	0 acres (no forest land)

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	North Site	Hydraulically Optimal Site	Drake Site	Preferred Site
	(7 acres for the compressor station and 2.7 acres for the access road and powerline)	(7 acres for the compressor station and 14.6 acres for the access road and powerline)	(7 acres for the compressor station)	
h. NSAs within one mile and distance to nearest NSA	<ul style="list-style-type: none"> No NSA's within one mile The nearest NSA is 2.6 miles from the site 	<ul style="list-style-type: none"> No NSA's within one mile The nearest NSA is 3.8 miles from the site 	<ul style="list-style-type: none"> The nearest NSA, the Drake Cement Plant, is within 0.5 miles from the site 	<ul style="list-style-type: none"> Portions of the Haystack Community within one mile The nearest NSA is 2,700' from the site
i. Environmental justice blocks affected (at compressor site)	1 (minority and low income)	1 (minority and low income)	1 (minority and low income)	1 (minority and low income)
j. Turbine/engine/motor horsepower amount	4418 hp/ CAT 3616 Engine I.S.O rated at 5,000 hp	4213 hp/ CAT 3616 Engine I.S.O rated at 5,000 hp	N/A	4429 hp/ CAT 3616 Engine I.S.O rated at 5,000 hp**
k. Gas cooling/heating required	Gas cooling and heating for auxiliary systems	Gas cooling and heating for auxiliary systems	N/A	Gas cooling and heating for auxiliary systems
l. Visual/noise screening present	Yes, due to distance to NSA	Yes, due to distance to NSA	No (visible from the Drake Cement Plant)	Yes; noise levels below 55 dba at nearest NSA; topography provides visual screening
m. Length of required powerline or other non-jurisdictional facilities required	3.9 miles	7.2 miles	N/A	2.5 miles
n. Length of pipeline lateral and suction discharge lines	300' to 400' each	300' to 400' each	N/A	300' to 400' each
o. Topographic or geological hazards	Low to no potential for landslides	High potential for landslides	No potential for landslides	Low to no potential for landslides
p. Number of waterbodies affected and acres of wetlands affected (compressor station site and access road)	<ul style="list-style-type: none"> 3 waterbodies affected No wetlands affected 	<ul style="list-style-type: none"> 7 waterbodies affected No wetlands affected 	N/A	<ul style="list-style-type: none"> 1 waterbody affected No wetlands affected
q. Floodplain designation (compressor site location only)	Zone X	Zone X	Zone D	Zone A

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	North Site	Hydraulically Optimal Site	Drake Site	Preferred Site
r. Additional Considerations	Additional facilities required; installation of a backpressure valve at mainline valve (MLV) 2 located approximately 2100 feet south of the Haystack Ranch Community. This facility would require an approximate 200-ft by 200-ft of construction workspace along with an approximate 250-foot access road. Once in service, EPNG would retain an approximate 100-foot by 100-foot fenced-in area to secure the aboveground valve facilities.	Additional facilities required; installation of a backpressure valve at mainline valve (MLV) 2 located approximately 2100 feet south of the Haystack Ranch Community. This facility would require an approximate 200-ft by 200-ft of construction workspace along with an approximate 250-foot access road. Once in service, EPNG would retain an approximate 100-foot by 100-foot fenced-in area to secure the aboveground valve facilities.	No additional facilities required	No additional facilities required
<p>* Assumes 30-foot road width.</p> <p>** The required horsepower provided in this response differs slightly from the originally filed values because the data request response utilized compressor manufacturer software while the expansion filing utilized Synergi Gas hydraulic modeling software to complete identical power calculations.</p> <p>*** Does not include 1.6 miles of Haystack Road/Jasper Trail that extends from Perkinsville Road north to the intersection with Forest Service Road 638.</p>				

Response prepared by or under the supervision of:

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 Environmental Permitting Project Manager
 719-520-4817