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

March 10, 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
Supplemental Alternative Analysis Information

Dear Ms. Reese:

El Paso Natural Gas Company, L.L.C. ("EPNG") is providing the Federal Energy Regulatory Commission ("FERC" or "Commission") a copy of an alternative comparison assessment of a North Site alternative to its proposed Haystack Compressor Station location.[1]

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

As a follow up to a supplemental filing submitted on February 17, 2025,[2] EPNG is providing the Commission a copy of an analysis document further comparing a North Site alternative to its proposed Haystack Compressor Station.[3] The analysis considers both the feasibility and the environmental impacts associated with constructing the proposed Haystack Compressor Station at an alternative site located approximately 1.5 miles north from its currently proposed location. The analysis concludes that EPNG's preferred site offers significantly less environmental and technical impacts over locating the station at the North Site and concludes that its proposed site is the most suitable option. Consistent with this analysis, EPNG respectfully requests that the Commission continue its analysis

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1 The alternative comparison assessment document was concurrently provided to representatives of the Haystack Ranches Community on March 10, 2025.

2 In that submittal, EPNG provided the Commission a copy of a written communication it had sent to representatives of the Haystack Ranches Community regarding terms under which it would assess further a North Site alternative to its proposed location for the Haystack Compressor Station.

3 A copy of the analysis is provided as Attachment 1 herein.

of the Maricopa Lateral Expansion Project to permit the issuance of an order approving its project at the preferred site by June 1, 2025.

Filing Information

EPNG is e-Filing this letter and information 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.

Respectfully submitted,

EL PASO NATURAL GAS COMPANY, L.L.C.

By /s/
Francisco Tarin
Director, Regulatory

Enclosures
Cc: Ms. Sareh Poormahdi, OEP

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March 10, 2025

Dear Community Members,

El Paso Natural Gas Company, L.L.C. (El Paso) appreciates the opportunity to continue engaging with the Haystack Ranches Community (Community) regarding its proposed compressor station project in Yavapai County, Arizona. As part of our commitment to responsible project development and as outlined in our February 17, 2025 letter to you, El Paso carefully evaluated an alternative site for the compressor station. After thorough analysis, El Paso determined that the originally proposed compressor station site remains the preferable location.

We have attached to this letter the project update that will be filed with FERC. As explained in the project update, the preferred site offers significantly less environmental and technical impacts over the alternative site, including less impact to wildlife, less land disturbance and mitigation, less air emissions from on-site natural gas electric generation (while waiting on grid connected power), less operational complexity related to a required pressure control valve, less impact to waterbody crossings, less safety challenges related to emergency response times, less risk from wildfires, and less risk and safety challenges related to crossing a high pressure third party pipeline. These factors, combined with the consideration of other environmental and land use impacts, led El Paso to conclude that the originally proposed site is the most suitable option. Accordingly, we will request that FERC finish processing and approve our current application by June 1, 2025.

We expect some members of the Community will be disappointed with our conclusion and will continue to oppose the project at the preferred site. Nevertheless, El Paso will continue its Community outreach efforts by sharing updates and discussing any additional questions and concerns that you might have regarding the project.

We appreciate your time and engagement.

Sincerely,

Will W. Brown
Chief Commercial Officer

El Paso Natural Gas Company, L.L.C.
Maricopa Lateral Expansion Project, Docket No. CP24-520-000

Supplemental Alternative Site Comparison

A. Summary

As discussed in EPNG's February 17, 2025 letter to the Haystack Ranches Community (the "Community"), a copy of which was filed with the Federal Energy Regulatory Commission on February 18, 2025, EPNG undertook an additional evaluation of a location for the Haystack Compressor Station upstream (north) of the Preferred Site (the "North Site"). The primary purpose of the additional evaluation was to more extensively evaluate the technical viability of the North Site and determine whether its environmental impact can be reduced to match or improve upon the impact of the Preferred Site.

This response presents EPNG's analysis of the two sites.[1] As further detailed below and in Table 2 located at the end of this submission, when compared to the Preferred Site, constructing the compressor station at the North Site would be significantly more harmful to the environment and technically challenging.

B. Compressor Site Comparison

(a) Environmental Impacts

The Preferred Site is a 7-acre site located on sparse grassland approximately 0.5 miles north of the Community's northern boundary. The North Site is a 7-acre site located on pinyon-juniper woodlands approximately 2 miles north of the Community's northern boundary. The North Site's pinyon-juniper woodlands offer more biodiversity and potential wildlife habitat than the Preferred Site's sparse grassland, and consequently, constructing the compressor station at the North Site would require more vegetation removal and potentially result in the destruction of wildlife habitat.

Based on a comparison of the topographies for the two sites, observations made during site visits, and publicly available data, the terrain at the North Site is steeper and more rugged than at the Preferred Site. The differences in terrain would require significantly more excavation and site preparation work at the North Site to achieve a suitable site for the compressor station. Such work,

[1] Constructing the compressor station at the North Site would require installing a pressure control valve on a 100' by 100' site located approximately 2,100 feet south of the Community's southern boundary (the "Valve Site"). Constructing the compressor station at the Preferred Site will not require installing a similar pressure control valve. The additional valve facilities would likely impact environmental, visual, noise, and other resources. However, while certain impacts that the pressure control valve could have on the project are noted in herein, a comprehensive analysis of those potential impacts is not included in this response.

including potential blasting, additional haul truck trips to remove rock and soil, and increased dust mitigation (water), would significantly increase the project's environmental impact. Moreover, excavation and other construction activities at the Valve Site would only further increase the environmental impact of constructing the compressor station at the North Site.

The nearest noise sensitive area ("NSA") to the Preferred Site is located 0.5 miles south of the site. Modeled noise levels at the NSA determined that noise emissions from the compressor station would be below the FERC standard of 55 dba. As previously noted, a hill will serve as a natural sound and visual barrier between the Preferred Site and the NSA. No NSAs are located within one mile of the North Site, and the nearest NSA to the North Site is approximately 2 miles south of the site. The nearest NSA to the Valve Site is located 0.8 miles north of the Valve Site. EPNG did not model the noise emissions from the pressure control valve to determine if the noise levels at the nearest NSA would be below the FERC standard of 55 dba.

Due to distance and the topography surrounding the Preferred Site, no visual impacts to the nearest NSA will occur. Similarly, due to distance and the topography surrounding the North Site, no visual impacts to the nearest NSA would occur. However, fencing and other above-ground facilities located at the Valve Site would likely be visible to the nearest NSA at that location.

No waterbodies will be affected by constructing the compressor station at the Preferred Site. A riverine intermittent streambed wash crosses the North Site.

(b) Technical and Safety Considerations

The North Site is west of the Maricopa Lateral on Arizona State Land Department ("ASLD") lands that abut Prescott National Forest. Transwestern Pipeline Company's ("Transwestern") 42-inch high-pressure natural gas pipeline runs parallel to and west of the Maricopa Lateral and is located between the North Site and the Maricopa Lateral. As a result, the 20-inch suction and discharge pipes needed to connect the compressor station to the Maricopa Lateral would cross Transwestern's pipeline. In addition to requiring Transwestern's consent and cooperation, crossing Transwestern's pipeline would result in significant technical challenges and additional risk to human health and safety. United States Department of Transportation, Pipeline Hazardous Material and Safety Administration regulations require a minimum of three feet of cover over the top of natural gas pipelines. In addition, natural gas pipeline operators typically require a minimum of two feet of clearance between pipelines. Based on these requirements and practices, crossing the suction and discharge pipes under Transwestern's high-pressure natural gas pipeline would require a trench that is over 10-feet deep. Excavating such a deep trench in the rocky substrata would be technically challenging. For safety purposes, use of hydraulic powered mechanical excavation near Transwestern's pipeline is limited and blasting rock is strictly prohibited. In

contrast, the Preferred Site will not require excavating near a foreign high-pressure natural gas pipeline or any other third-party facilities.

As noted above, the North Site is surrounded by pinyon-juniper woodlands and the Preferred Site is surrounded by sparse grassland. Pinyon-juniper woodlands are susceptible to more intense (hotter) and faster moving wildfires than sparse grassland due to the increased biomass present in woodlands.[2] Constructing the compressor station at the North Site would increase the risk of the compressor station facilities being exposed to and damaged by wildfires.

(c) Additional Considerations

The North Site and the Preferred Site are located on ASLD lands. The Valve Site is located on private lands. During EPNG's early project planning stages, it approached the owner of the Valve Site lands to discuss acquiring land for a compressor station site. At that time, the landowner was unwilling to sell or lease lands to EPNG for the project. Based on that experience, EPNG does not believe the landowner will voluntarily sell or lease the Valve Site to EPNG.

C. Access Road Comparison

To potentially mitigate the North Site's environmental impact, EPNG evaluated two possible road access routes for the North Site: one route would cross ASLD and Prescott National Forest lands using U.S. Forest Service Road 638 ("North Access Road 1") and the second route would cross ASLD and private lands using an existing two-track road ("North Access Road 2"). As previously described in EPNG's submissions, access to the Preferred Site will cross ASLD lands using a shorter segment of U.S. Forest Service Road 638. These alternative routes are depicted in Figures 1 and 2 attached at the end of this submission.

(a) Environmental Impacts

Access to the Preferred Site will require widening and upgrading approximately 0.5-miles of U.S. Forest Service Road 638. Accessing the North Site using North Access Road 1 would require widening and substantially upgrading approximately 2.1-miles of U.S. Forest Service Road 638 (including the 0.5 mile segment that will be improved for the Preferred Site). Accessing the North Site using North Access Road 2 would require widening and substantially upgrading approximately 3.1 miles of an existing two-track road.

North Access Road 1 and North Access Road 2 would both require significant improvements to widen and stabilize the roads to safely transport large industrial equipment (*e.g.*, a 183,000 lb. compressor skid, 72,000 lb. engine, and other large components) during construction and to ensure

[2] *See* Putz, T., Restaino, C. 2021, *Pinyon-Juniper Encroachment: Effects on Wildfire*, Extension | University of Nevada, Reno, FS-21-117, https://naes.agnt.unr.edu/PMS/Pubs/2022-4638.pdf.

reliable access for ongoing operations and maintenance. Similar to preparing the North Site, improving either access road to the North Site would require extensive additional excavating, blasting, haul truck trips, rock disposal, dust mitigation (water) measures, and other work that would significantly increase the project's environmental impact.

Access to the Preferred Site will affect 1.8 acres of sparse grassland. North Access Road 1 would affect 7 acres of sparse grassland and pinyon-juniper woodlands. North Access Road 2 would affect 11 acres of sparse grassland and pinyon-juniper woodlands.

The access road used to access the Preferred Site will cross a single intermittent wash. As provided in the Commercial Building Permit issued by Yavapai County, a roadway culvert and bridge will be constructed over the intermittent wash. In contrast, North Access Road 1 would cross three waterbodies and North Access Road 2 would cross seven waterbodies, including two crossings of Granite Creek. Potential impacts to these waterbody crossings would need to be addressed and mitigated.

(b) Technical and Safety Considerations

As previously described in EPNG's submissions, the Preferred Site is located 0.9 miles east of a rock quarry. Other commercial and industrial facilities are also located nearby. Emergency responders already plan for and are prepared to respond to such nearby facilities. In contrast, the remote North Site would only be accessible from a single substantially longer access road (compared to the Preferred Site). Constructing the compressor station at the North Site would increase emergency response times and present additional safety and security concerns.

Furthermore, an access road to the North Site would cross through steeper terrain and could become damaged, especially during monsoon season or as a result of wildfires affecting the surrounding pinyon-juniper woodlands. Increased runoff during monsoon season or soil erosion caused by wildfires[3] could lead to road washouts or otherwise make access roads to the North Site unusable—thus making the North Site completely inaccessible until repairs can be made.

(c) Additional Considerations

All of the Preferred Site's 0.5-mile access road will be located on ASLD lands. Approximately 0.8 miles of North Access Road 1 would be within the Prescott National Forest and the remaining 1.1 miles would be on ASLD lands. Approximately 2.2 miles of North Access Road 2 would be on ASLD lands and the remaining 0.9 miles would be on private lands. Portions of North Access Road 2 would be within the town limits of Chino Valley or cross prime farmland. Access to the Valve Site would cross private lands.

[3] *See Id*.

Of the two options, North Access Road 1 is preferable for safety, constructability, and ease of access. However, using North Access Road 1 would require road improvements in Prescott National Forest, which would add additional environmental considerations and concerns.

D. Powerline Comparison

The nearest source of three-phase power required for the compressor station is approximately 3 miles south of the North Site, necessitating construction of a 3.9-mile powerline on ASLD and Prescott National Forest lands. Based on feedback from the local electric utility provider regarding construction feasibility and the time required to permit and install the powerline, on-site natural gas-fired generators may be required to operate the compressor station. This could increase noise levels at the North Site and result in higher air pollutant emissions compared to the Preferred Site. The following table compares the potential emissions of each site.

Table 1. Annual Emission Comparison

Pollutant	Annual Site-Wide Potential to Emit (tpy)		
	Preferred Site	North Site*	Net Emission Increase from North Site
NOx	25.25	33.85	8.6
CO	50.5	67.71	17.21
VOC	11.48	17.72	6.24
PM10	1.5	1.79	0.29
SO2	0.09	0.11	0.02
Single HAP	8.03	9.57	1.54
Total HAPs	11.49	13.71	2.22
CO2	22153	26474	4321
CH4	37.73	37.79	0.06
CO2e	23106	27430	4324

* Annual potential-to-emit assumes the auxiliary generator will run full-time at the alternative location.

E. Schedule and Economic Impacts

Moving the compressor station to the North Site would delay the project by 18 months (estimated) or more, which would result in a significate hardship to both EPNG and the project's shipper, Southwest Gas Corporation. Furthermore, based on budgetary proposals and historical information from similar projects, moving the compressor station to the North Site would increase the cost of the project by 18.26% to 21.32%—which would effectively render the project uneconomic. Major

contributing factors include additional equipment, materials, engineering, permitting, powerline extension, access roads, environmental mitigation, and construction.

F. Conclusion

Compared to the Preferred Site, changing the compressor station's location to the North Site would clearly and significantly increase the project's environmental impacts and technical challenges by:

- converting pinyon-juniper woodlands and associated wildlife habitat (rather than the less ecologically diverse sparse grassland surrounding the Preferred Site);
- requiring significant additional blasting, excavation, soil and rock removal, dust mitigation measures, and other work to grade the North Site, widening and improving the longer access road, and constructing the longer powerline;
- crossing the Prescott National Forest to access the North Site (if North Access Road 1 is used) and potentially affecting new landowners (to use the Valve Site and if North Access Road 2 is used) not currently affected by the Preferred Site;
- impacting and crossing more waterbodies; and
- increasing the project's (a) total expected air emissions (*e.g.*, on-site gas-powered generator use), (b) scope (*e.g.*, the Valve Site, longer access road, and longer powerline), (c) emergency response times, (d) risk from wildfires and to continuous site accessibility, and (e) technical and safety challenges associated with crossing under Transwestern's high-pressure natural gas pipeline.

Table 2. Preferred Site and North Site Comparison

	North Site (North Access Road 1)	North Site (North Access Road 2)	Preferred Site
a. Site acres and land type affected*	7 acres (pinyon-juniper woodlands)	7 acres (pinyon-juniper woodlands)	7 acres (sparse grassland)
(i) Additional acres required for access road and powerline and land type affected	• 7 acres for a powerline (sparse grassland and pinyon-juniper woodlands) • 7 acres for access road (sparse grassland and pinyon-juniper woodlands)	• 7 acres for a powerline (sparse grassland and pinyon-juniper woodlands) • 11 acres for access road (sparse grassland and pinyon-juniper woodlands)	• 1.8 acres for a powerline (sparse grassland only) • 1.8 acres for access road (sparse grassland only)
(ii) Total acres of lands affected	21 acres (15 acres of ASLD lands; 6 acres of Prescott National Forest lands)	25 acres (19 acres of ASLD lands; 3 acres of Prescott National Forest lands; 3 acres of private lands)	10.6 acres (all on ASLD lands)
b. 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: 1. a compressor station site lease from the ASLD 2. a road easement from the ASLD and the USFS 3. a powerline easement from the ASLD and the USFS	Requires: 1. a compressor station site lease from the ASLD 2. a road easement from the ASLD and a private landowner 3. a powerline easement from the ASLD and the USFS	Requires: 1. a compressor station site lease from the ASLD 2. a road easement from the ASLD 3. a powerline easement from the ASLD
c. Affects special or sensitive resources	IPAC review: Mexican Wolf, Yellow-billed cuckoo, Gila Chub, Gila Topminnow, Gila Trout, Loach Minnow, Spikedace, Monarch Butterfly, Suckley's Cuckoo Bumble Bee	IPAC review: Mexican Wolf, Yellow-billed cuckoo, Southwestern Willow Flycatcher, Gila Chub, Gila Topminnow, Gila Trout, Loach Minnow, Spikedace, Monarch Butterfly, Suckley's Cuckoo Bumble Bee	IPAC review: Yellow-billed cuckoo, Southwestern willow Flycatcher, Gila Chub, Gila Topminnow, Gila Trout, Loach Minnow, Spikedace, Monarch Butterfly, Suckley's Cuckoo Bumble Bee
d. Length of access road	2.1 miles	3.1 miles	0.5 miles

	North Site (North Access Road 1)	North Site (North Access Road 2)	Preferred Site
e. Prime farmland	Not prime farmland (NRCS 2025)	Portions of the access road are prime farmland (NRCS 2025)	Not prime farmland (NRCS 2025)
f. Forest land cleared (acres)	9.7 acres (7 acres for the compressor station; 2.7 acres for the access road and powerline)	12.9 acres (7 acres for the compressor station; 3.1 acres for the access road; 2.7 acres for the powerline)	0 acres (no forest land)
g. NSAs within one mile and distance to nearest NSA	• No NSA's within one mile • The nearest NSA is 2 miles from the site	• No NSA's within one mile • The nearest NSA is 2 miles from the site	• Portions of the Community are within one mile • The nearest NSA is 2,700' from the site
h. Environmental justice blocks affected (at compressor site)	1 (minority and low income)	1 (minority and low income)	1 (minority and low income)
i. Turbine/engine/motor horsepower amount	4418 hp/ CAT 3616 Engine I.S.O rated at 5,000 hp	4418 hp/ CAT 3616 Engine I.S.O rated at 5,000 hp	4429 hp/ CAT 3616 Engine I.S.O rated at 5,000 hp
j. Gas cooling/heating required	Gas cooling and heating for auxiliary systems	Gas cooling and heating for auxiliary systems	Gas cooling and heating for auxiliary systems
k. Visual/noise screening present	Yes, due to distance to NSA	Yes, due to distance to NSA	Yes; noise levels below 55 dba at nearest NSA; topography provides visual screening
l. Length of required powerline or other non-jurisdictional facilities required**	3.9 miles	3.9 miles	2.5 miles
m. Length of pipeline lateral and suction discharge lines	300' to 400' each	300' to 400' each	300' to 400' each
n. Topographic or geological hazards	Low to no potential for landslides	Low to no potential for landslides	Low to no potential for landslides
o. Number of waterbodies affected and acres of wetlands affected	• 3 waterbodies affected • No wetlands affected	• 7 waterbodies affected (including 2 crossings of Granite Creek)	• 1 waterbody affected • No wetlands affected

	North Site (North Access Road 1)	North Site (North Access Road 2)	Preferred Site
(compressor station site and access road)		• Potential wetlands affected	
p. Permit Requirements	• Yavapai Couty Commercial Building Permit (including Floodplain) • U.S. Forest Service Special Use Permit • ADEQ Air Permit	• Yavapai Couty Commercial Building Permit (including Floodplain) • U.S. Corps of Engineers Clean Water Act Permit (possibly) • ADEQ Air Permit • Town of Chino Valley Permits (possibly)	• Yavapai Couty Commercial Building Permit (including Floodplain) (permit issued on March 6, 2025, Permit No. COM24-000275) • ADEQ Air Permit (issued)
q. Floodplain designation (compressor site location only)	Zone X	Zone A (access road only)	Zone A
r. Additional Considerations	Additional facilities required (installation of a pressure control valve 2,100' south of the Community)	Additional facilities required (installation of a pressure control valve 2,100' south of the Community	No additional facilities required

* All acreages, lengths, and distances are approximate and subject to change based on civil surveys and field verifications.

** EPNG has assumed the route would follow the proposed access road and the existing pipeline right-of-way, however, a final route has not been identified by the local electric utility provider.

Figure 1. Topographic View of Project Components and Alternatives

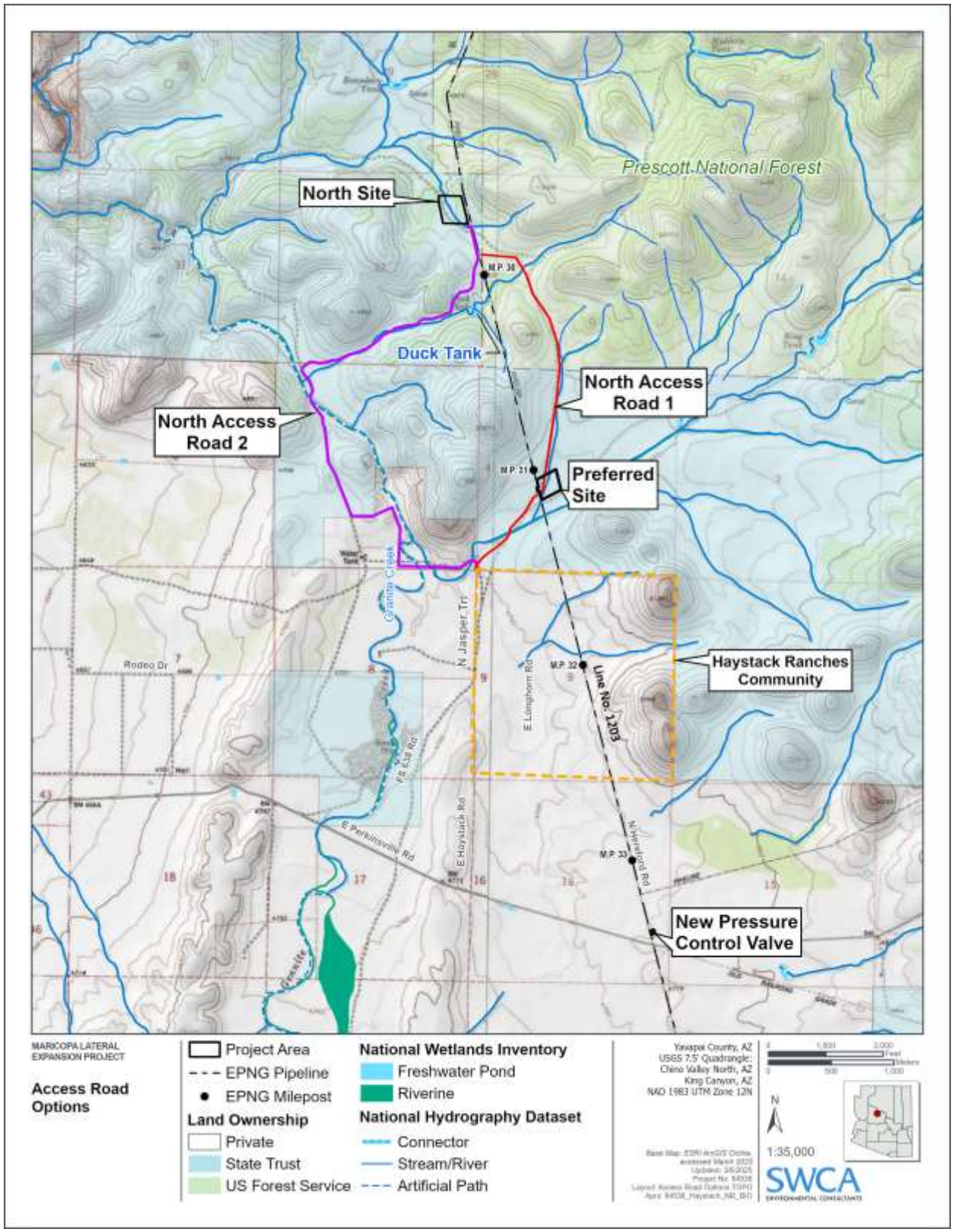
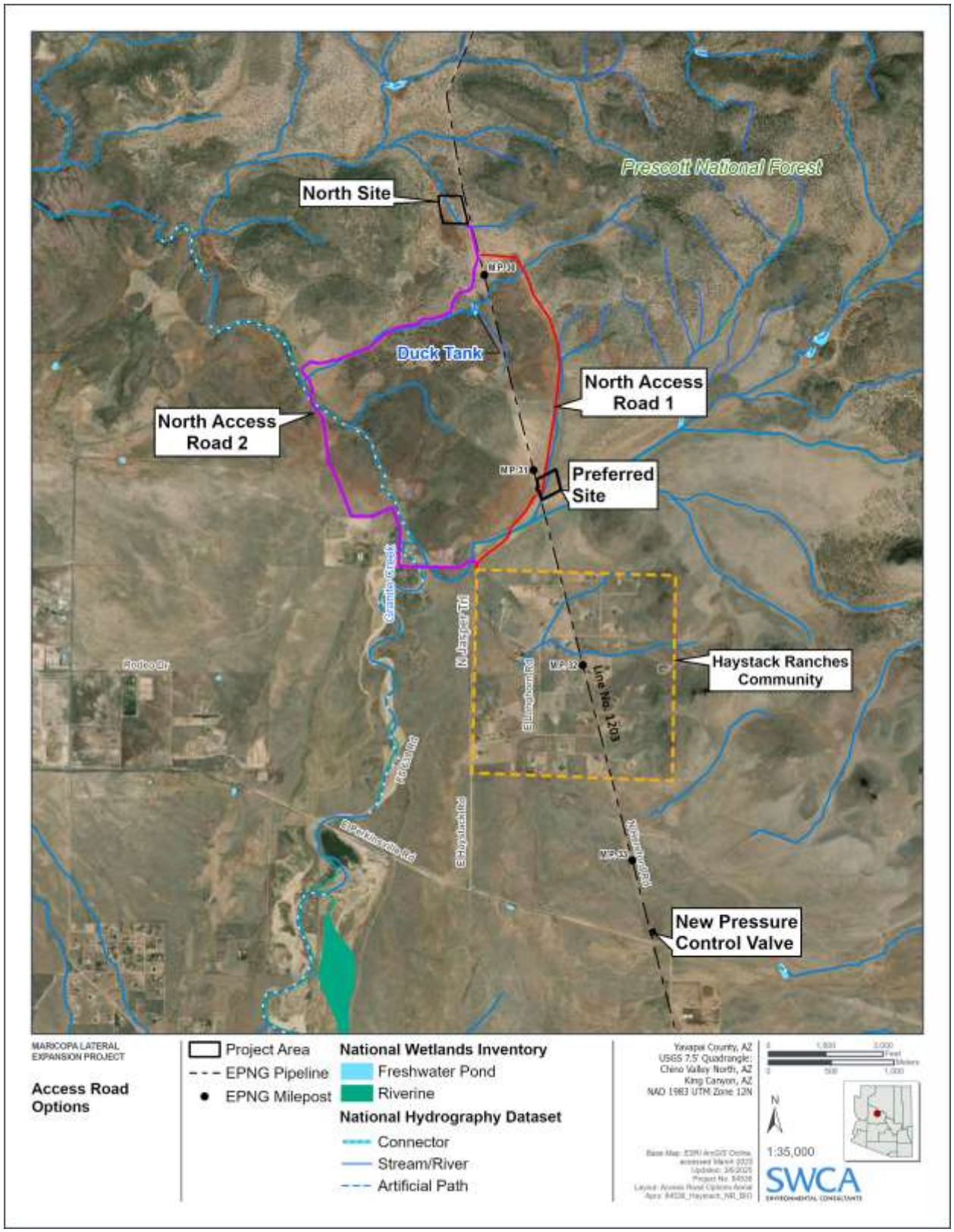


Figure 2. Aerial View of Project Components and Alternatives



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 10th day of March 2025.

/s/
Francisco Tarin

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(719) 667-7517