

February 18, 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 Follow-up Response to Data Request - OEP/DG2E/Gas Branch 2

#### Dear Ms. Reese:

On February 14, 2025, El Paso Natural Gas Company, L.L.C. ("EPNG") filed with the Federal Energy Regulatory Commission ("Commission") responses to a February 12, 2025 data request ("Data Request") from the Office of Energy Projects ("OEP") seeking information pertaining to the proposed Maricopa Lateral Expansion Project. In the responses, EPNG indicated that its response to Question No. 2 was still being finalized and anticipated to file with the Commission by February 19, 2025. EPNG is herein filing its response to Question No. 2 of the February 14, 2025 Data Request.

## **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 Question No. 2 of the Data Request.

## Filing Information

EPNG is e-Filing this letter and its response 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

#### Resource Report 9: Air Quality and Noise

2. Update table 9.1-5 and indicate whether EPNG would install any blowdown facilities at the Haystack Compressor Station, describe the expected types (e.g., individual unit, full station, capped), estimate the average number of yearly blowdowns by type, and the amount of gas released per event type quantified in tons as methane and as greenhouse gases (GHGs) in carbon dioxide equivalent (CO2e). Indicate whether the blowdown would be installed with a silencer and estimate the noise impact at the nearest noise sensitive areas (NSA).

#### <u>Response</u>:

The Haystack Compressor Station will include blowdown facilities as described below. There will be two types of blowdown events at the facility: "station" and "unit" blowdowns. A "station" blowdown involves venting to atmosphere all gas within the station between the suction and discharge block valves. A "unit" blowdown involves venting gas within the compressor unit suction and discharge isolation valves.

As far as the frequency of each event, "station" blowdown events are triggered in the event of an emergency or for testing (planned) purposes. The US Department of Transportation (USDOT), Pipeline and Hazardous Materials Safety Administration (PHMSA), requires a test of the facility Emergency Shut Down (ESD) system once each calendar year not to exceed 15 months. Under this test (planned) event the facility ESD system is triggered, and a "station" blowdown is initiated, however for testing (planned) purposes the blowdown valves are capped, and gas will not be vented to atmosphere. "Unit" blowdown events are required for maintenance of the engine/compressor unit and typically occur 2-4 times a year.

EPNG is providing an updated Table 9.1-5 below to reflect the effects of blowdowns. In addition, EPNG is providing Table 9.1-6 to show the associated emissions for each type of event.

# Table 9.1-5 Summary of Potential Emissions of Regulated Air Pollutants for GasCompressor Engine and Emergency Engine (tpy)

Source	NOx	со	VOC	SO <sub>2</sub>	<b>PM</b> <sub>10</sub>	PM <sub>2.5</sub>	Total HAPs	CO <sub>2</sub> e
Natural Gas–Fired Engine	24.14	48.28	9.66	0.0873	1.4831	1.4831	11.26	21,908
Natural Gas–Fired Emergency Engine	1.11	2.22	0.55	0.0010	0.0177	0.0177	0.13	262
Station Piping Component Fugitives	-	-	1.27	-	-	-	0.10	771
Station and Compressor Engine Blowdowns	-	-	0.04	-	-	-		166
Site-Wide Emissions Total	25.25	50.50	11.52	0.09	1.50	1.50	11.49	23,107

#### El Paso Natural Gas Company, L.L.C. Maricopa Lateral Expansion Project, Docket No. CP24-520-000 February 12, 2025 Environmental Information Request

Table 9.1-6 Summary of Potential Emissions of Greenhouse Gas Pollutants for Statio	'n
and Compressor Engine Blowdowns (tpy)	

Source	Volume per Event (MSCF/event)	Annual Events	Annual Volume Vented (MSCF/yr)	VOC	CH4	CO2	CO₂e
Station Blowdown	199.6	1	199.6	0.024	3.92	0.02	98.07
Natural Gas–Fired Engine Blowdown	34.5	4	138	0.017	2.71	0.01	67.80
Total	-	-	337.6	0.041	6.63	0.03	165.87

To address noise impacts associated with blowdown events, EPNG will install multiple blowdown silencers at the Haystack compressor station facility to ensure noise levels caused by blowdown events will be below the FERC limit. For a station blowdown event, the "peak" sound level will be equal to or less than 51 dBA Ldn at the closest NSA, located ~2,700-ft from the blowdown silencer. For a "unit" blowdown event the "peak" sound level will be equal to or less than 30 dBA Ldn at the closest NSA, located ~2,700-ft from the blowdown silencer.

Response prepared by or under the supervision of:

Raul Ronquillo Project Manager STATE OF COLORADO

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 February 18, 2025, to the Office of Energy Projects' Data Request dated February 12, 2025 in Docket No. CP24-520-000, that as such he is authorized to verify the Responses, 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.

SUBSCRIBED AND SWORN TO before me, the undersigned authority, on this 18<sup>th</sup> day of February 2025.

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



## **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 18<sup>th</sup> day of February 2025.

/s/ Francisco Tarin

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