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

December 16, 2024

INFORMATION HAS BEEN REMOVED FROM THIS DOCUMENT FOR PRIVILEGED TREATMENT (18 C.F.R. § 388.112)

CRITICAL ENERGY INFRASTRUCTURE INFORMATION (CEII) HAS BEEN REMOVED FROM THIS DOCUMENT (18 C.F.R. § 388.113(c))

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/DPC/CB-1

Dear Ms. Reese:

On December 5, 2024, 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 responses 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. 2.

Filing Information

Since the information being provided contains privileged/critical energy infrastructure information, EPNG respectfully requests that the hydraulic model files, Attachment 2, to the response to question 2a. be accorded privileged treatment,

pursuant to Section 388.112 of the Commission's regulations, 18 C.F.R. § 388.112 (2024), and has labeled this information with "CUI//PRIV - Contains Privileged Information - Do Not Release". The privileged material is also considered Critical Energy Infrastructure Information pursuant to Section 388.113(c) of the Commission's regulations, 18 C.F.R.§ 388.113(c) (2024), and has been labeled this information with "CUI//CEII - Contains Critical Energy Infrastructure Information - Do Not Release".

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.

Respectfully submitted,

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

By /s/
William D. Wible
Vice President

Enclosures

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 16th day of December 2024.

/s/
William D. Wible

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

STATE OF COLORADO)
)
COUNTY OF EL PASO)

WILLIAM D. WIBLE, 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 Responses filed on December 16, 2024, to the Office of Energy Projects' Data Request dated December 5, 2024 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.

William D. Wible

SUBSCRIBED AND SWORN TO before me, the undersigned authority, on this 16th day of December 2024.

STACIE S GONZALEZ
NOTARY PUBLIC - STATE OF COLORADO
NOTARY ID 20184008426
MY COMMISSION EXPIRES FEB 21, 2026

Stacie S. Gonzalez
Notary Public, State of Colorado
My Commission Expires: Feb 21, 2026

2. For several protests, it was noted that, during a meeting held on Thursday, September 26, 2024, the Kinder Morgan Project Team stated that the proposed compressor station location is the only feasible site according to the pressure/flow hydraulic analysis.

    a. Provide the results of the hydraulic analysis conducted by El Paso used to determine the optimal location for the proposed compressor station. File hydraulic models used to conduct said analysis.

    b. In Resource Report 10, El Paso identified five alternative sites downstream of the proposed location, with the furthest being 2.6 miles south of the proposed location. Explain why no upstream locations were considered. Provide data to support the movement of the compressor station by no more than 2.6 miles from the proposed location.

    c. Conduct a review of the proposed compressor station's performance when the radius of the optimal location is expanded to a maximum five-mile radius. Discuss and demonstrate why the compressor station will not meet the needs of the Project to maintain operating pressures and delivery volumes to downstream compressor facilities and customer delivery points.

Response:

During the community meeting held on September 26, 2024 (the "*Community Meeting*"), the El Paso team shared with attendees a general overview of its Haystack Compressor Station site-selection process. Among the information shared was a brief discussion regarding the role of El Paso's hydraulic analysis in the selection process. If the El Paso team made any statement during such discussion intimating that the proposed Haystack Compressor Station's location near milepost 31+0750 (the "*Preferred Location*") is the only feasible location according to El Paso's hydraulic analysis, then such statement was either misstated or misunderstood. In fact, El Paso identified multiple potential compressor station locations along the Maricopa Lateral where the pipeline's hydraulics would meet the Project's necessary pressure and volume requirements, including the Preferred Location and the five alternative sites identified in Resource Report 10.

While adequate pipeline hydraulics was an essential factor in selecting the Preferred Location, it was not the only factor that El Paso considered. Other factors, such as the Project's potential impact on the environment and other resources, land availability, and proximity to homes, businesses, and recreation areas, were also considered. After considering the relevant factors, for the reasons set forth in Resource Report 10 and further provided in this Response, El Paso determined that the Preferred Location offered significant environmental and economic advantages over other potential locations, including the five alternative sites identified in Resource Report 10 and locations upstream (north) of the Preferred Location.

2a. Natural gas generally flows more efficiently at higher pressures. Accordingly, the Haystack Compressor Station's hydraulically optimal location would be near milepost 26+2400 (the

"*Hydraulically Optimal Location*"), which is approximately 4.5 miles upstream (north) of the Preferred Location. Locating the compressor station at the Hydraulically Optimal Location would achieve the highest possible average operating pressure on the Maricopa Lateral that both (i) does not exceed the pipeline's desired maximum operating pressure ("*MOP*") and (ii) provides sufficient downstream operating pressure and delivery volumes necessary to meet customer delivery obligations and other operational requirements. Attachment 2 to this response, which is provided separately and designated as "*CUI//PRIV - Contains Privileged Information - Do Not Release*" and "*CUI//CEII - Contains Critical Energy Infrastructure Information - Do Not Release*", includes the hydraulic model supporting this response.

2b. During the Project's early planning phase, El Paso considered potential upstream (north) locations for the Haystack Compressor Station. However, such locations were eliminated from further consideration when it became apparent that the Preferred Location and the five alternative sites identified in Resource Report 10 offered significant environmental and economic advantages over potential upstream locations.

Increased Environmental Impact

Constructing the Haystack Compressor Station upstream (north) of the Preferred Location would likely increase the Project's environmental impact, including its impact on vegetation, wildlife, visual resources, and perceptible noise emissions.

(i) Vegetation and Wildlife

The Preferred Location is only approximately 0.5 miles south of the Prescott National Forest. Constructing the Haystack Compressor Station upstream (north) of the Preferred Location would require constructing the compressor station and/or other permanent and temporary Project components such as access roads, high voltage power lines, temporary workspaces, and staging areas (collectively, the "*Additional Project Facilities*") within such national forest. As noted in Resource Report 3, the Preferred Location is sparsely vegetated and does not contain suitable natural habitat for wildlife. In contrast, based on a desktop review of publicly available information, the Prescott National Forest includes relatively undisturbed natural habitat for several federally listed threatened or endangered species, including the Mexican Wolf (*Canis lupus baileyi*) and the Yellow-billed Cuckoo (*Coccyzus americanus*). Project activities within the Prescott National Forest, including site clearing and grading, vehicular traffic, and ongoing periodic maintenance, would increase Project-related vegetation removal and could potentially alter or fragment wildlife habitat, displace wildlife, and result in other secondary effects, including increased wildlife mortality, injury, and stress.

(ii) Visual Resources and Noise Emissions

As noted in Resource Report 8, a rise in the topography between the Preferred Location and the nearest residences will provide a visual barrier between the Haystack Compressor Station and such residences—effectively shielding the compressor station from the residences' field of view. In contrast, potential locations upstream (north) of the Preferred Location are significantly higher in elevation and lack the favorable topography of the Preferred Location, and depending on the upstream location, the compressor station could be visible from such residences and other surrounding areas, including from locations within the Prescott National Forest.

Similarly, the topography between the Preferred Location and the nearest residences will provide a natural sound-mitigating buffer between the Haystack Compressor Station and such residences. Although a location upstream (north) of the Preferred Location would be physically farther away from such residences, El Paso believes that an upstream location would not perceptively improve (or even potentially increase) the impact that the Project's noise emissions have on such residences relative to the Preferred Location—again, due to the benefits of the Preferred Location's lower elevation and concealing topography.

Moreover, locating the Haystack Compressor Station within (or surrounded by) the Prescott National Forest would introduce artificial noises and views into a relatively undisturbed forested environment. In contrast, the Preferred Location and the alternative sites identified in Resource Report 10 are already surrounded by a variety of artificial noises and views from industrial and agricultural facilities. For example, a rock quarry (located approximately 0.3 miles northwest of the nearest residence), a sand and gravel yard (located approximately 0.7 miles southwest of the nearest residence), two firearm shooting ranges (located approximately 1 mile west of the nearest residence), and a meat processing plant (located approximately 1 mile west of the nearest residence) currently surround the neighborhood comprising the nearest residences to the Preferred Location.

Economically Impracticable

Constructing the Haystack Compressor Station upstream (north) of the Preferred Location would require constructing additional facilities, require additional mitigation measures, and delay the Project's in-service date, all of which could cumulatively make the Project economically impractical—if not unfeasible.

(i) Construction of Additional Project Facilities

A location upstream (north) of the Preferred Location would require constructing the Haystack Compressor Station and/or the Additional Project Facilities on or through the forested, rugged, and steep terrain of the Prescott National Forest. The Additional Project Facilities, including the scope and size thereof and added difficulty of constructing such facilities through the challenging terrain,

would significantly increase the complexity, timing, cost, and risk of the Project—including the risk to worker safety and health.

Furthermore, the Maricopa Lateral currently has a maximum allowable operating pressure ("*MAOP*") break at milepost 33+1957 that reduces the pipeline's operating pressure from 894 psig (upstream of the break) to 877 psig (downstream of the break). As discussed above, locating the Haystack Compressor Station upstream (north) of the Preferred Location would require increasing the compressor station's planned discharge pressure that, in turn, would necessitate constructing additional facilities at the MAOP break to account for the higher discharge pressure—thereby further increasing the scope and cost of the Project and ongoing operational complexity of the Maricopa Lateral.

(ii) Additional Mitigation Measures

In addition to increasing the Project's environmental impact, other resources could also be affected by constructing the Haystack Compressor Station upstream (north) of the Preferred Location. El Paso did not identify all of the resources that could be affected by an upstream location. However, additional mitigation measures designed to minimize the degree and duration of the Project's impact on the environment and other resources within the Prescott National Forest, including additional revegetation and habitat preservation efforts, would almost certainly be necessary—all of which would increase the complexity, scope, timing, and cost of the Project.

(iii) USFS Rights-of-Way

El Paso developed the Project in response to potential shippers expressing an urgent and immediate need for deliveries of additional natural gas volumes into the Phoenix, Arizona area. Constructing the Haystack Compressor Station within (or surrounded by) the Prescott National Forest would require obtaining one or more rights-of-way from the U.S. Forest Service (the "*USFS*"). Obtaining a right-of-way from the USFS can take up to two years. By designing the Project to avoid Prescott National Forest lands, El Paso determined that the Project's facilities could be constructed and placed in-service a year or more earlier than would otherwise be possible if a USFS right-of-way were required—thereby operationally and economically benefiting the Project's shippers.

Finally, as noted in El Paso's request for prior notice authorization, the Project's capacity was awarded to Southwest Gas Corporation ("*SWG*") following the Project's open season. El Paso and SWG subsequently entered into a firm transportation service agreement whereby El Paso agreed to provide the firm transportation service thereunder as soon as the Project facilities are placed in-service. Delaying the Project to acquire necessary USFS rights-of-way would adversely affect El Paso, SWG, and the price its utilities customers pay for natural gas service.

In summary, locating the Haystack Compressor Station upstream (north) of the Preferred Location would increase the scope, complexity, risk, and cost of the Project, and in turn, likely increase the

Project's cumulative impact on the environment and other resources, including by performing Project-related construction and other activities in Prescott National Forest, and potentially make the Project economically impracticable or unfeasible—all without meaningfully improving the Project's impact on visual resources or perceptibly reducing the minimal effect the Project's noise emissions is expected to have on residences.

2c. A compressor station location within five miles upstream (north) of the Hydraulically Optimal Location (*i.e.*, between milepost 21+1600 and the Hydraulically Optimal Location) is not hydraulically viable because the Haystack Compressor Station's discharge pressure would need to exceed the MOP to meet downstream customer delivery obligations and other operational requirements. Conversely, a compressor station location within five miles downstream (south) of the Hydraulically Optimal Location (*i.e.*, between the Hydraulically Optimal Location and milepost 31+3900) is a hydraulically viable option that would allow sufficient operating pressures and delivery volumes to meet downstream delivery obligations and other operational requirements.

Response prepared by or under the supervision of:

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