BASIN ELECTRIC POWER COOPERATIVE

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June 19, 2009

JUN 2 2 2009

Mr. Lee Gribovicz
Western Regional Air Partnership (WRAP)
1600 Broadway, Suite 1700
Denver, CO 80202

Dear Mr. Gribovicz:

Basin Electric Power Cooperative (Basin Electric) is a consumer-owned, regional cooperative headquartered in Bismarck, North Dakota. Basin Electric has reviewed the Draft Report titled *"Supplementary Information for Four-Factor Analyses for Selected Individual Facilities in North Dakota"* dated May 18, 2009, and have the following comments for your consideration.

Page ii: You state in your Scope of Document Section that:

"This document provides an initial analysis of the four factors which must be considered in establishing a reasonable progress goal toward achieving natural visibility conditions in mandatory Class I areas".

We would like to point out that there is regulatory defined fifth factor that must be a part of this analysis. Any determination for the application of additional controls to reduce primary pollutants must further consider the degree of visibility improvement on a deciview (dv) and cost per deciview basis ($/dv) that would occur by the implementation of any controls. We recognize the document may have been directed to address the first four aspects of the evaluation process. We feel the fifth fact is of greater importance and is more consistent with the language and intent of the law. Further, the analysis must consider the impacts of all sources impacting visibility, and must be fair and non-discriminatory between source types, and should not simply tart energy generation units.

Page 3-2,3-5 and 3-6: Mismatch of text and titles of Table's 3-1, 3-2 and 3-3. They should be Table 2-1, 2-2 and Table 2-3 or correct text.

Page 3-3 Table 3-2 Control Options for Selected Boilers – North Dakota indicates the SO_2 control technology to be evaluated over and above the existing technology of Dry Scrubber would be Wet FGD technology. Basin Electric believes there are potential intermediate improvements steps associated with Dry FGD technology that should also be evaluated.

Page 3-4 We agree on your discussion on the application of SCR on North Dakota Lignite coal-fired boilers may not be technically feasible. You further state that each boiler should be evaluated to determine this technical feasibility. At the point in time where the utilities are required to perform the case-by-case technical evaluation for all additional pollution control equipment, the current body of knowledge will be utilized to make this technical and economic evaluation. Again the actual amount of visibility improvement on an incremental basis (both on dv and $/dv) from the next level of control technology will need to apart of the final evaluation process.

Page 3-4 Time Necessary for Compliance: We generally agree with your assessment of the five to six years to achieve emission reductions; however our units' major unit outages (6-8 weeks) are scheduled every three years. Depending on how the regulatory process unfolds with the outage schedules, the overall implementation timeline may need to be increased.

Basin Electric appreciates the opportunity to comment on your efforts.

Sincerely,

Lyle Witham
Manager of Environmental Services

crm/lw/gmj