

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

**IN THE MATTER OF:** )  
 )  
**NO<sub>x</sub> EMISSIONS FROM STATIONARY** ) **R07-19**  
**RECIPROCATING INTERNAL COMBUSTION** ) **(Rulemaking – Air)**  
**ENGINES AND TURBINES:** )  
**AMENDMENTS TO 35 ILL.ADM.CODE** )  
**SECTION 201.146 AND PARTS 211 AND 217.** )

**NOTICE OF FILING**

To:

John T. Therriault, Assistant Clerk  
Illinois Pollution Control Board  
James R. Thompson Center  
Suite 11-500  
100 West Randolph  
Chicago, Illinois 60601

Persons included on the  
**ATTACHED SERVICE LIST**

PLEASE TAKE NOTICE that we have today filed with the Office of the Clerk of the Pollution Control Board the **PIPELINE CONSORTIUM'S MOTION FOR PRODUCTION OF INFORMATION.**

  
Kathleen C. Bassi

Dated: June 29, 2007

Renee Cipriano  
Kathleen C. Bassi  
Stephen J. Bonebrake  
Joshua R. More  
SCHIFF HARDIN, LLP  
6600 Sears Tower  
233 South Wacker Drive  
Chicago, Illinois 60606  
312-258-5500  
Fax: 312-258-5600

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

**IN THE MATTER OF:** )  
 )  
**NO<sub>x</sub> EMISSIONS FROM STATIONARY** ) **R07-19**  
**RECIPROCATING INTERNAL COMBUSTION** ) **(Rulemaking – Air)**  
**ENGINES AND TURBINES:** )  
**AMENDMENTS TO 35 ILL.ADM.CODE** )  
**SECTION 201.146 AND PARTS 211 AND 217.** )

**PIPELINE CONSORTIUM'S MOTION FOR  
PRODUCTION OF INFORMATION**

NOW COME ANR PIPELINE COMPANY, NATURAL GAS PIPELINE COMPANY, TRUNKLINE GAS COMPANY, and PANHANDLE EASTERN PIPELINE COMPANY (collectively "the Pipeline Consortium"), by and through their attorneys, SCHIFF HARDIN LLP, and, pursuant to 35 Ill.Adm.Code §§ 102.402 and 101.614, move the Hearing Officer to order the Illinois Environmental Protection Agency ("Agency") to produce any and all documents related to the BaseK OSAT/PSAT simulations summarized in the PowerPoint presentation that accompanied Michael Koerber's pre-filed testimony, submitted by the Agency on May 11, 2007, including specifically the following data, in the manner set forth later in this Request:

1. CAMx Run scripts for simulation K2012R4S1a\_APCA\_nopig
2. OSAT Source region maps for simulation 2012R4S1a\_APCA\_nopig
3. CAMx emissions files for simulation K2012R4S1a\_APCA\_nopig
4. CAMx model outputs for simulation K2012R4S1a\_APCA\_nopig
5. CAMx Run scripts for the PSAT simulations of K2012R4S1a
6. PSAT Source region maps for simulations of K2012R4S1a
7. CAMx emissions files for PSAT simulations of K2012R4S1a
8. CAMx model outputs for simulation K2012R4S1a

The Pipeline Consortium requires this data to develop its affirmative case in opposition to the Agency's proposed rule. The Agency has informed the Pipeline Consortium's attorneys that

it is processing the data and will provide it within 10-14 days, which would be July 10, 2007, at the latest. The Pipeline Consortium requests that the Hearing Officer establish July 10, 2007, as the latest date by which the Agency should provide the information with the admonition that it should be provided sooner if possible.

Because the data requested is modeling data and is highly technical in nature, possibly even written in a format that normal word processing-type computers are not able to read, the Pipeline Consortium requests that the data be transferred directly from LADCO, where Mr. Koerber is the Executive Director and which is the developer and keeper of the data requested, to the Pipeline Consortium's consultant, Alpine Geophysics, LLC. If the data is to be conveyed on a computer disk, it should be sent to the following address in the most expedient manner:

Alpine Geophysics, LLC  
Attention: Mr. Dennis McNally  
7341 Poppy Way  
Arvada, Colorado 80007

If the data can be conveyed electronically and if electronic conveyance is the method typically used for conveying this modeling data,<sup>1</sup> it should be sent to Mr. McNally as follows:

[dem@alpinegeophysics.com](mailto:dem@alpinegeophysics.com)

Electronic conveyance is our preferred method for having the data transferred.

---

<sup>1</sup> We note that LADCO is, under normal circumstances, very open in sharing its modeling data with its fellow modelers.

Respectfully submitted,

ANR PIPELINE COMPANY, NATURAL GAS  
PIPELINE COMPANY, TRUNKLINE GAS  
COMPANY, and PANHANDLE EASTERN PIPELINE  
COMPANY

by:

  
\_\_\_\_\_  
One of Their Attorneys

Dated: June 29, 2007

Renee Cipriano  
Kathleen C. Bassi  
Stephen J. Bonebrake  
Joshua R. More  
SCHIFF HARDIN, LLP  
6600 Sears Tower  
233 South Wacker Drive  
Chicago, Illinois 60606  
312-258-5500  
Fax: 312-258-5600

CH2\ 1916972.1

**CERTIFICATE OF SERVICE**

I, the undersigned, certify that on this 29<sup>th</sup> day of June, 2007, I have served electronically the attached **PIPELINE CONSORTIUM'S MOTION FOR PRODUCTION OF INFORMATION** upon the following persons:

John T. Therriault, Assistant Clerk  
Illinois Pollution Control Board  
James R. Thompson Center  
Suite 11-500  
100 West Randolph  
Chicago, Illinois 60601

Persons included on the  
**ATTACHED SERVICE LIST**

  
Kathleen C. Bassi

Renee Cipriano  
Kathleen C. Bassi  
Stephen J. Bonebrake  
Joshua R. More  
SCHIFF HARDIN, LLP  
6600 Sears Tower  
233 South Wacker Drive  
Chicago, Illinois 60606  
312-258-5500  
Fax: 312-258-5600

**SERVICE LIST**  
**(R07-19)**

Timothy Fox  
Hearing Officer  
ILLINOIS POLLUTION CONTROL BOARD  
100 West Randolph, Suite 11-500  
Chicago, Illinois 60601  
[foxt@ipcb.state.il.us](mailto:foxt@ipcb.state.il.us)

John Kim  
Rachel Doctors  
Robb H. Layman  
Division of Legal Counsel  
ILLINOIS ENVIRONMENTAL  
PROTECTION AGENCY  
1021 North Grand Avenue, East  
P.O. Box 19276  
Springfield, Illinois 62794-9276  
[john.j.kim@illinois.gov](mailto:john.j.kim@illinois.gov)  
[rachel.doctors@illinois.gov](mailto:rachel.doctors@illinois.gov)  
[robb.layman@illinois.gov](mailto:robb.layman@illinois.gov)

Katherine D. Hodge  
N. LaDonna Driver  
Gale W. Newton  
HODGE DWYER ZEMAN  
3150 Roland Avenue  
P.O. Box 5776  
Springfield, Illinois 62705-5776  
[khodge@hdzlaw.com](mailto:khodge@hdzlaw.com)  
[nldriver@hdzlaw.com](mailto:nldriver@hdzlaw.com)  
[gnewton@hdzlaw.com](mailto:gnewton@hdzlaw.com)

William Richardson, Chief Legal Counsel  
Virginia I Yang, Deputy Counsel  
ILLINOIS DEPARTMENT OF NATURAL  
RESOURCES  
One Natural Resources Way  
Springfield, Illinois 67202-1271  
[bill.richardson@illinois.gov](mailto:bill.richardson@illinois.gov)  
[virginia.yang@illinois.gov](mailto:virginia.yang@illinois.gov)