

EXHIBIT 3



SAN JUAN

ALLIANCE

VI-16

October 10, 2006

VIA E-MAIL ATTACHMENT/CERTIFIED MAIL

Mr. Robert Baker
Air-3
U.S. Environmental Protection Agency
75 Hawthorne Street
San Francisco, California 94105
E-mail: baker.robert@epa.gov

Dear Mr. Baker:

On behalf of the hundreds of members of the San Juan Citizens Alliance that live, work, and recreate in the Four Corners region, I want to thank you for the opportunity to provide testimony during public hearings on EPA's Draft Prevention of Significant Deterioration ("PSD") permit for the proposed Desert Rock Power Plant held on October 3 and 4, 2006.

As I hope became clear to the agency during public testimony, the Four Corners area, and San Juan Basin in particular, is already subject to degraded air quality with associated and adverse public health impacts. Our community is currently saddled with a legacy of pollution from the Four Corners Power Plant, the San Juan Generating Station and tens of thousands of existing and projected natural gas wells in the Four Corners region. Absent significant offsets and/or zero emissions from the proposed plant, Desert Rock Power Plant is certain to exacerbate health and environmental problems throughout the region.

That said, and as already expressed during public testimony, the San Juan Citizens Alliance respectfully requests that EPA immediately, and at a minimum, undertake the following measures in preparation of the Draft PSD permit for the proposed Desert Rock Power Plant:

- (1) As already requested by Congressman John Salazar, the comment period for the Draft PSD permit for the Desert Rock Power Plant must be extended to match the public comment period for the final Environmental Impact Statement ("EIS") for the Desert Rock Power Plant. EPA is currently a cooperating agency and is assisting in the EIS process with a focus on air quality and solid waste disposal issues. Thus, the San Juan Citizens Alliance does not foresee that synchronizing the EIS and Draft PSD comment period would be at all problematic for the agency; and,

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(2) In the interim (and while the public awaits the release of the Desert Rock EIS), the EPA should supplement data for the Draft PSD permit to include emissions from natural gas facilities in the region and a minimum of 1-year of on-site monitoring data. Based on EPA's statements to the media, and in particular statements by EPA's Colleen McKaughan, it is apparent that EPA agrees with the public that the baseline air quality data and analysis used for the Draft PSD permit for the proposed Desert Rock Power Plant is deficient. Thus, EPA should work to supplement the information provided to the public and the current modeling analysis.

The public deserves a thorough analysis of all impacts that would result from the proposed Desert Rock Power Plant. The Four Corners region cannot afford streamlined analyses of a massive coal-fired power plant when the cumulative results would adversely affect already degraded air quality.

Given the swiftly approaching deadline for public comment on the Draft PSD permit for Desert Rock, I'm hopeful you will provide a decision on this request within five (5) business days. Please don't hesitate to contact me at (505) 360-8994 if you have any questions.

Sincerely,

Mike Eisenfeld
New Mexico Staff Organizer

cc: Honorable Congressman John Salazar
Honorable Congressman Tom Udall
Wally White, La Plata County Commissioner
Brad A. Bartlett, Managing Attorney, Energy Minerals Law Center

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