BEFORE THE ENVIRONMENTAL QUALITY COUNCIL
STATE OF WYOMING

In the Matter of:	)	
Basin Electric Power Cooperative	)	Docket No. 10-2802
Air Quality Permit No. MD-6047	)	
BART Permit: Laramie River Station	)	

RESPONSE TO BASIN ELECTRIC'S MOTION FOR SUMMARY JUDGMENT

Basin Electric's BART NOx Emission Limit proposal, 3/16/09

EXHIBIT 11

BASIN ELECTRIC POWER COOPERATIVE

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BISMARCK, NORTH DAKOTA 58503-0564
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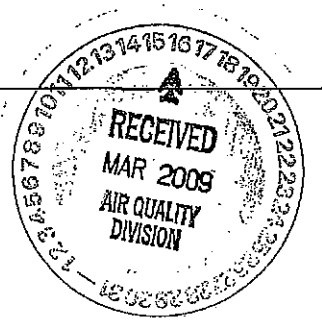

March 16, 2009

Mr. David Finley, Administrator
Air Quality Division
WY Department of Environmental Quality
122 West 25th Street Herschler Building
Cheyenne, WY 82002

Dear Mr. Finley:

The Department of Environmental Quality (DEQ) notified Basin Electric in June 2006 that the Laramie River Station (LRS) was a Best Available Retrofit Technology (BART) applicable source which required a BART engineering and modeling analysis for reducing visibility impacts in accordance with the Environmental Protection Agency's Guidelines for BART Determinations under the Regional Haze Rules (40 CFR Part 51). Visibility impacts for LRS were evaluated at two Federal Class I areas – Badlands National Park and Wind Cave National Park.

A BART review was required to identify the best retrofit technology for the reduction of nitrogen oxides (NOx), sulfur dioxide (SO_2), and particulate matter (PM) emissions from LRS Units 1, 2 and 3. Basin Electric contracted Black & Veatch to conduct a BART analysis to identify technically feasible and cost-effective technologies following the BART Guidelines. A modeling analysis was completed to evaluate the impact on visibility in the two identified Class I areas. Reports and subsequent revisions of the BART analyses were submitted to your office on February 28, 2007; September 25, 2007; February 14, 2008; and July 24, 2008.

As a result of our meeting with your staff on March 2, 2009, Basin Electric proposes a BART limitation for NOx emissions on a 30-day rolling average of 1,348 lb/hour for Unit 1; 1,348 lb/hour for Unit 2; and 1,386 lb/hour for Unit 3, which is calculated from emissions of 0.21 lb/million Btu. In addition, we agree to an annual mass emissions limitation of 5,343 tons/year for Unit 1; 5,343 tons/year for Unit 2; and 5,493 tons/year for Unit 3, which is calculated from emissions of 0.19 lb/million Btu.

We are proceeding with our plans to install over-fire air (OFA) on Unit 1 this spring, Unit 2 in the spring of 2010, and on Unit 3 in the spring of 2011. In addition, we plan to upgrade to low-NOx Burners (LNB) on Units 1, 2, and 3 in 2012, 2013, and 2014, respectively. While we anticipate emissions of 0.18 lb/mmBtu under ideal operating conditions, normal emissions are likely to be higher.

After Basin Electric and DEQ agree on a plan, we will present it to the Missouri Basin Power Project (MBPP) management and ask approval from the project owners.

If you have any questions, please contact me at 701-557-5654 or Lyle Witham at 701-557-5652.

Sincerely,

Robert L. Eriksen, P.E.
Sr. Environmental Compliance Administrator

/gmj
cc: Chad Schlichtemeier, DEQ
Mike Fluharty
David Cummings
Lyle Witham