

Dakota lignite units are located at mine-mouth facilities without access to other coal types. MRY does not have access to alternate coal supplies. It has no rail spur or barge access to transport the coal to the facility. Therefore, MRY depends entirely on the fuel extracted from the neighboring BNI mine, and without incurring substantial economic cost and significant waste of resources, MRY has no means to control coal quality.

24. When high mercury batches of coal are combusted, the original 2012 MATS mercury emission limitation provided lignite power plants enough margin in their percentage of mercury removal to account for higher mercury emissions due to the mercury content in the coal. 77 Fed. Reg. 9304, 9490 (Feb. 16, 2012).

25. It is well-known and consistent with Minnkota's experience that lignite deposits vary significantly in quality, including fuel combustion performance and mineral content. Mercury content in the lignite varies because different seams within the mine yield lignite with diverse attributes (including mercury) on a day-to-day basis. Minnkota currently