To: Russ, Timothy[Russ.Tim@epa.gov]; Daly, Carl[Daly.Carl@epa.gov]; Jackson, Scott[Jackson.Scott@epa.gov]; Laumann, Sara[Laumann.Sara@epa.gov]
Cc: Strobel, Philip[Strobel.Philip@epa.gov]
From: Hinkle, Vanessa
Sent: Thur 3/6/2014 5:51:20 PM
Subject: RE: Letter from WDEQ to BLM - State Interpretation of Permits for General Conformity Purposes

Hi everyone,

I just wanted to follow up with the details on how I received the letter. I called Cole and asked for a copy of the letter. He said that Brian Hall would be the appropriate person to talk to, but that Brian was out. Since Brian was out, Cole said he would try to find a copy of the letter and e-mail it to me. I sent Cole an e-mail asking for a copy of the letter so e would have my e-mail address. Cole later left me a voice mail saying that WDEQ had internally discussed my request for the letter and decided it would be best if I could ask BLM for a copy of the letter. I called Charis and left her a voice mail asking for a copy of the letter. Charis sent the e-mail below. I haven't had any discussion with Charis on the subject.

Ex. 5 - Deliberative Process

Vanessa

From: Russ, Timothy
Sent: Thursday, March 06, 2014 10:10 AM
To: Daly, Carl; Jackson, Scott; Laumann, Sara
Cc: Hinkle, Vanessa
Subject: FW: Letter from WDEQ to BLM - State Interpretation of Permits for General Conformity Purposes

Hi Carl, Scott, and Sara,

Vanessa advised me that she was on a call last week with the BLM and State (and perhaps some political folks) discussing NEPA projects. Apparently WYDEQ stated on the call that they had sent a letter to the BLM addressing the State's permits and general conformity. Vanessa advised me that after the call she contacted Cole Anderson (WYDEQ) and asked for a copy of the letter, but it appears below that actually Charis (BLM) sent her a copy.

With regard to the State's 1/31/14 letter (attached), Ex. 5 - Attorney Client

Ex. 5 - Attorney Client

A.) The beginning of the second paragraph states:

"Under the authority of Chapter 6, Section 2 of the WAQSR and the application of Best Available Control Technology (BACT), the Air Quality Division (Division) issues permits which address emissions from, but are not limited to, the following oil and gas source categories: storage tanks, dehydration units, process heaters, pneumatic equipment. separation vessels. truck loading, fugitives, engines."

The third, conclusionary paragraph then states:

"Sources with permits issued under the authority of Wyoming's EPA approved new source review

permitting program (WAQSR Chapter 6, Section 2) are exempt from a general conformity determination."

Ex. 5 - Attorney Client

Ex. 5 - Attorney Client

Ex. 5 - Attorney Client

"At the discretion of the Administrator, the Division has also issued permits for reducing emissions from temporary sources such as well completion activities and well blowdown and venting episodes. The Division also worked with operators in the Jonah/Pinedale Development Area (JPDA) to permit drill rigs. These permits were issued to the operators on a voluntary basis under the State of Wyoming's EPA approved minor source permitting program and as such, include federally enforceable emission limits and conditions for reducing emissions from these sources. While the operators submitted permit applications for the drill rigs on a voluntary basis, compliance with the permit conditions and associated limits is not."

Ex. 5 - Attorney Client

"Sources with permits issued under the authority of Wyoming's EPA approved new source review

permitting program (WAQSR Chapter 6, Section 2) are exempt from a general conformity determination."

Ex. 5 - Attorney Client

Ex. 5 - Deliberative Process

Ex. 5 - Deliberative Process

Tim

Tim Russ
Environmental Scientist
USEPA Region 8
Air Program
1595 Wynkoop Street (8P-AR)
Denver, CO 80202-1129
Ph. (303) 312-6479
Fax (303) 312-6064
e-mail: russ.tim@epa.gov

From: Hinkle, Vanessa
Sent: Tuesday, March 04, 2014 9:14 AM
To: Russ, Timothy
Cc: Strobel, Philip; Jackson, Scott
Subject: FW: Letter from WDEQ

Letter from WDEQ regarding permitted sources and general conformity.

From: Tuers, Charis [mailto:ctuers@blm.gov]
Sent: Tuesday, March 04, 2014 9:06 AM
To: Hinkle, Vanessa
Subject: Letter from WDEQ

Referred to BLM

Charis A. Tuers

Air Resource Specialist

Bureau of Land Management

Wyoming State Office

(307) 775-6099

ctuers@blm.gov