Message

From: Atkinson, Emily [Atkinson.Emily@epa.gov]
Sent: 4/17/2018 7:52:57 PM
To: Lee Fuller [lfuller@ipaa.org]
Subject: Confirmed 4/27 at 2pm: Subpart OOOOa

Hi Lee,
You are confirmed for a 45 minute meeting on Friday, April 27 at 2:00pm with Clint Woods and Justin Schwab. Directions and procedures to 1200 Pennsylvania Avenue NW:

Metro: If you come by Metro get off at the Federal Triangle metro stop. Exit the metro station and go up two sets of escalators to the surface level and turn right. You will see a short staircase and wheelchair ramp leading to a set of glass doors with the EPA logo - that is the William Jefferson Clinton Federal Building, North Entrance.

Taxi: Direct the taxi to drop you off on 12th Street NW, between Constitution and Pennsylvania Avenues, at the elevator for the Federal Triangle metro stop - this is almost exactly half way between the two avenues on 12th Street NW. Facing the building with the EPA logo and American flags, walk toward the building and take the glass door on your right hand side with the escalators going down to the metro on your left – that is the North Lobby of the William Jefferson Clinton building.

Security Procedures: A government issued photo id is required to enter the building and it is suggested you arrive 15 minutes early in order to be cleared and arrive at the meeting room on time. Upon entering the lobby, the meeting attendees will be asked to pass through security and provide a photo ID for entrance. If you are a foreign national entering on a non-US passport, please let us know in advance, as there is a separate clearance process.

Upon arrival, let the guards know that you were instructed to call 202-564-7404 for a security escort. Please send me a list of participants in advance of the meeting and feel free to contact me should you need any additional information.

Emily

Emily Atkinson
Management Analyst/Office Manager
Immediate Office of the Assistant Administrator
Office of Air and Radiation, USEPA
Room 5412B, 1200 Pennsylvania Avenue NW
Washington, DC 20460
Voice: 202-564-1850
Email: atkinson.emily@epa.gov

From: Lee Fuller [mailto:lfuller@ipaa.org]
Sent: Tuesday, April 17, 2018 3:51 PM
To: Atkinson, Emily <Atkinson.Emily@epa.gov>
Subject: RE: Subpart OOOOa

I can make that work.

From: Atkinson, Emily <Atkinson.Emily@epa.gov>
Sent: Tuesday, April 17, 2018 3:46 PM
To: Lee Fuller <lfuller@ipaa.org>
Subject: RE: Subpart OOOOa

Hi Lee,

Could Friday, April 27 at 2:00pm work on your end?

Emily Atkinson
Management Analyst/Office Manager
Immediate Office of the Assistant Administrator
Office of Air and Radiation, USEPA
Room 5412B, 1200 Pennsylvania Avenue NW
Washington, DC 20460
Voice: 202-564-1850
Email: atkinson.emily@epa.gov

From: Lee Fuller [mailto:lfuller@ipaa.org]
Sent: Tuesday, April 17, 2018 3:43 PM
To: Atkinson, Emily <Atkinson.Emily@epa.gov>
Subject: RE: Subpart OOOOa

Unfortunately, I am in Houston that day.

From: Atkinson, Emily <Atkinson.Emily@epa.gov>
Sent: Tuesday, April 17, 2018 3:41 PM
To: Lee Fuller <lfuller@ipaa.org>
Subject: FW: Subpart OOOOa

Hi Lee,

It looks like Clint Woods and Justin Schwab could be available for a 45 minute in person meeting on Thursday, May 3 at 3:00pm.

Please let me know if this could work on your end.

Emily

Emily Atkinson
Management Analyst/Office Manager
Immediate Office of the Assistant Administrator
Office of Air and Radiation, USEPA
Room 5412B, 1200 Pennsylvania Avenue NW
Washington, DC 20460
Voice: 202-564-1850
Email: atkinson.emily@epa.gov

From: Woods, Clint
Sent: Tuesday, April 17, 2018 9:34 AM

To: Atkinson, Emily <Atkinson.Emily@epa.gov>
Subject: Fwd: Subpart OOOOa

Begin forwarded message:

> **From:** Lee Fuller <lfuller@ipaa.org>
> **Date:** April 17, 2018 at 8:18:19 AM EDT
> **To:** "Woods, Clint" <woods.clint@epa.gov>
> **Subject: Re: Subpart OOOOa**
>
> Justin Schwab has been in prior meetings from OGC. OAQPS is fine too. I hope to bring a few people too.
>
> Sent from my iPhone
>
> On Apr 17, 2018, at 8:01 AM, Woods, Clint <woods.clint@epa.gov> wrote:
>
>> Lee,
>>
>> Sorry for delay - Emily should be in touch shortly on meeting timing. One question: Would you be interested in having our career folks from OAQPS & the Office of General Counsel participate? Thanks!
>>
>> Clint
>>
>> On Apr 4, 2018, at 6:53 PM, Lee Fuller <lfuller@ipaa.org> wrote:
>>
>>> Thanks. Will look forward to the opportunity.
>>>
>>> Sent from my iPhone
>>>
>>> On Apr 4, 2018, at 6:12 PM, Woods, Clint <woods.clint@epa.gov> wrote:
>>>
>>>> Lee,
>>>>
>>>> Thanks so much for your email, and apologies for the delayed follow up. We are taking a closer look at the attachment, and would welcome the chance to discuss further when convenient. I've copied Emily Atkinson, who may be able to help us in finding a good date/time.
>>>>
>>>> Clint Woods
>>>> Deputy Assistant Administrator
>>>> Office of Air and Radiation, U.S. EPA
>>>> 202.564.6562
>>>>
>>>> **From:** Lee Fuller [mailto:lfuller@ipaa.org]
>>>> **Sent:** Monday, April 2, 2018 11:30 AM
>>>> **To:** Woods, Clint <woods.clint@epa.gov>; Gunasekara,

Mandy <Gunasekara.Mandy@epa.gov>; Schwab, Justin <Schwab.Justin@epa.gov>
Cc: James D. Elliott (jelliott@spilmanlaw.com) <jelliott@spilmanlaw.com>
Subject: Subpart OOOOa

On March 13, IPAA, several state based trade associations and several member companies met with EPA staff at Research Triangle Park to discuss our concerns with the current structure of Subpart OOOOa. While the discussion addressed a number of issues, most of it focused on various definitions that create the scope of the application of the regulations, the fugitive emissions monitoring program and decisions related to the treatment of low production wells. We provided the attached document at the meeting; it is principally addressing the nature of the industry and the role of low production wells including material that responds to published statements by EPA regarding its decision to remove the proposed exclusion of low production wells from the fugitive emissions monitoring program. These include a response to the Environmental Defense Fund allegations that low production wells are "super emitters" and EPA's use of component counts in justifying the inclusion of low production wells.

Clearly, there are other policy issues that we would like to address, too. I would like to suggest a meeting to bring these before you in the near future.

Thanks,

Lee Fuller