MEMORANDUM

To: Docket EPA–HQ–OAR–2010–0505

From: Karen Marsh, U.S. EPA, OAQPS, Sector Policies and Programs Division

Subject: Discussion of Comment Submitted on the NODA with ConocoPhillips Alaska, Inc.

Date: January 17, 2018

On January 12, 2018, Karen Marsh had a telephone discussion with Laura Perry of ConocoPhillips Alaska, Inc. (CPAI) to discuss comments submitted by CPAI on the Notice of Data Availability (NODA) for the proposed stay of the Oil and Natural Gas Sector: Emission Standards for New, Reconstructed, and Modified Sources (NSPS OOOOa). CPAI submitted comments on the NODA that indicated they had immediate concerns with being able to comply with the requirement to complete initial monitoring of the fugitive emissions components at well sites located on the Alaskan North Slope.

Ms. Marsh contacted CPAI in order to clarify the specific issue that CPAI identified. Specifically, CPAI only mentioned well sites as a concern for compliance in their comment letter, even though compressor stations have the same initial monitoring requirement. Ms. Perry stated that none of CPAI's compressor stations that are located on the Alaskan North Slope has triggered the fugitive emissions monitoring requirements in NSPS OOOOa, therefore, there was no immediate compliance concern for these sites. Additionally, Ms. Perry indicated that, to her knowledge, there were no compressor stations located on the Alaskan North Slope (including those owned by other companies) that were currently subject to the fugitive emissions monitoring requirements. Therefore, their comments were limited to the immediate compliance concerns with regard to well sites located on the Alaskan North Slope.

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