Message

From: Vazquez, Natalia [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3C90404A684241CD8EFA526ED48D9992-VAZQUEZ, NA]
Sent: 9/20/2018 6:33:52 PM
To: Trinh Tran [Trinh.Tran@cabotog.com]
CC: Isin, Amelie [Isin.Amelie@epa.gov]
Subject: RE: Subpart OOOOa annual report

Trinh,

Good afternoon. As the template for the annual certification (60.5420a(b)) is still in draft format operators are not required to use the template. Operators can submit their report by either mail to Region 3 or through CEDRI. On the other hand, if you were submitting any other type of report that has a template available online (i.e., 60.5422a(a) and (b) reports), then you are require to submit it through CEDRI using the template, regardless of the rule being under reconsideration.

Let me know if you have any further questions,

Natalia

Natalia Vazquez
Environmental Engineer
Office of Air Enforcement and Compliance Assistance
U.S. EPA Region 3
1650 Arch Street (3AP20)
Philadelphia, PA 19103
215-814-2121

From: Trinh Tran [mailto:Trinh.Tran@cabotog.com]
Sent: Thursday, September 20, 2018 10:09 AM
To: Vazquez, Natalia <Vazquez.Natalia@epa.gov>
Subject: FW: Subpart OOOOa annual report

Thanks,

Mai-Trinh (Trinh) Tran
Manager, Emissions Compliance

Cabot Oil & Gas Corporation
840 Gessner Road, Suite 1400
Houston, TX 77024-4152

(281)589-4805 office
(832) 457-1664 cell

From: Trinh Tran
Sent: Wednesday, September 19, 2018 3:47 PM
To: 'isin.amelie@epa.gov' <isin.amelie@epa.gov>

Cc: 'vaquez.natalia@epa.gov' <vaquez.natalia@epa.gov>
Subject: FW: Subpart OOOOa annual report

Natalia,

I was referred to you by Amelie Isin and I hope for guidance from you in regard to the question in my email below.

In short, EPA Region 6 has informed us (members of AXPC, IPAA, API) that for this upcoming annual Subpart OOOOa Certification due October 31, the industry is not required to report via CEDRI as the rule is influx and changes are expected with the forms. Please see attached.

My question is would this also be the case with Region 3? We are working with our IT team to automate the population of the required forms and I would like to delay this effort while the rule is being reconsidered and possible changes to the form may take place.

Thanks,

Mai-Trinh (Trinh) Tran
Manager, Emissions Compliance

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From: Trinh Tran
Sent: Tuesday, September 04, 2018 10:42 AM
To: r3wellcompletion@epa.gov; mwejkszner@pa.gov
Cc: John Smelko <john.smelko@cabotog.com>; Maria Champagne - Cabot Oil & Gas Corporation <maria.champagne@cabotog.com>
Subject: Subpart OOOOa annual report

Good morning,

EPA Region 6 recently confirmed to members of AXPC tradegroup that for the upcoming Subpart OOOOa annual report due October 31, operators are not required to submit via the CEDRI template for subject sources. Would this be the same case with Region 3?

We are required to submit via CEDRI if the report template has been final and available for 90 days. The annual report form has been available for more than 90 days and we were under the impression that CEDRI template is final; however, recent clarifications from EPA Region 6 and updated language on CEDRI shows that the template is still considered as being in draft form and annual reports using the CEDRI template is voluntary. I would appreciate your response.

Thanks,

Mai-Trinh (Trinh) Tran
Manager, Emissions Compliance

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