Message

From: Ho, Yenhung [Ho.Yenhung@epa.gov]
Sent: 9/3/2020 3:51:41 PM
To: Albright, David [Albright.David@epa.gov]
Subject: FW: Notes of Aug 28 EPA-CES call
Attachments: Notes of August 28 EPA-CES call.docx

fyi

From: Shari Ring <Shari.Ring@cadmusgroup.com>
Sent: Wednesday, September 2, 2020 12:52 PM
To: Ho, Yenhung <Ho.Yenhung@epa.gov>; Rao, Kate <Rao.kate@epa.gov>
Cc: MaryEllen.Tuccillo@cadmusgroup.com
Subject: Notes of Aug 28 EPA-CES call

Attached are the notes of last week's call with CES. Please let me know if you have any comments or additions.

Below are a few notes about the items on which you promised to follow up with CES that may be useful:

- Regarding the GSDT, the Information Request module will prompt CES to submit a response document (which could be a letter with as many images/attachments as they want). There is also space for uploading supplemental materials (e.g., data files, maps, images). If they wanted to update their permit application at this time, they could do that via the Project Tracking module and let us know that they did. (We highly recommend encouraging them to wait on that or, if they want to do it now, to be very clear what has changed and how it addresses each question.)

- Regarding funding of financial instruments, the regs do allow for a pay-in period for a trust fund or escrow account (this needs to be approved by EPA). I'd need to do more research on this (and I recommend discussing it with HQ), but I think we'd want a pay-in schedule that is commensurate with the risk (i.e., pre-injection vs. operating).

Shari Ring
The Cadmus Group LLC
703.247.6159

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