Message

From: Rowsey, Kevin [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=FDD13C32A3E54246AEB75BD0D9018EDA-ROWSEY, KEV]
Sent: 5/7/2021 7:40:55 PM
To: Dangelo, AJ [Dangelo.Aj@epa.gov]
Subject: RE: Roulette Oil & Gas

The deadline that was had has long since passed. It was our 180-day timeframe to get the permit issued from date of application to permit issuance but it's not regulatory. Region 3 management and HQ are aware of the circumstances surrounding this permit. All agree that it's better for us to answer the comments completely and thoroughly than to rush it out the door.

Kevin Rowsey
Source Water & UIC Section
Water Division
U.S. EPA Region III
1650 Arch Street
Philadelphia, PA 19103
Phone: 215.814.5463

From: Dangelo, AJ <Dangelo.Aj@epa.gov>
Sent: Friday, May 07, 2021 1:29 PM
To: Rowsey, Kevin <rowsey.kevin@epa.gov>
Subject: RE: Roulette Oil & Gas

Kevin:

Thanks for the update. Let me know if/how/when I can help.

Given that the contractor isn't likely even going the be able to get started on drafting actual responses until some time in June . . . does that crate any cause for concern ? Do you or your management have any proposed, preferred . . . or mandatory deadline by which responses should or must be published ?

Sincerely,

A.J. D'Angelo
A.J. D'Angelo
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Air & Toxics Branch
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From: Rowsey, Kevin <rowsey.kevin@epa.gov>
Sent: Friday, May 07, 2021 1:23 PM
To: Dangelo, AJ <Dangelo.Aj@epa.gov>
Subject: RE: Roulette Oil & Gas

Hi A.J.,

I just wanted to give you an update on the Roulette Response to Comments. I met with HQ and Cadmus last week to discuss the work plan for Cadmus to complete our RTC. They told me by the end of May they would identify all major topics for the comments submitted and then submit them to me for my approval. After my approval of the major topics, they will summarize all the comments.

At the beginning of June they start a new contract with HQ. At that time, they'll be able to devote more resources to actually begin to respond to the comments. They said that of course all of the responses will need to go through the UIC Program and ORC in Region 3. I sent them about 10 examples of RTC that we've done for various disposal permits over the years. Hopefully they can use that language and we'll see something we're used to seeing.

I just wanted to give a quick update on what is going on. I'm still working on the Response to the Seneca Nation. It's taking much longer that what I had expected! But I'm chugging along. I'll send you a draft as soon as I'm finished.

Have a great weekend!

Kevin Rowsey
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From: Dangelo, AJ <Dangelo.Aj@epa.gov>
Sent: Wednesday, April 28, 2021 9:01 AM
To: Bryant, Renee <bryant.renee@epa.gov>
Cc: Rowsey, Kevin <rowsey.kevin@epa.gov>
Subject: RE: Roulette Oil & Gas

Renee:

Thanks for the heads-up. Much appreciated. Should be interesting !

Sincerely,

A.J. D'Angelo

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From: Bryant, Renee <bryant.renee@epa.gov>
Sent: Wednesday, April 28, 2021 8:53 AM
To: Dangelo, AJ <Dangelo.Aj@epa.gov>
Cc: Rowsey, Kevin <rowsey.kevin@epa.gov>
Subject: RE: Roulette Oil & Gas

Hi AJ,

At first it was just to bring Kelly up to speed but then we thought it would be good for everyone to hear about the consultative process. Brian Hamilton will give us a brief overview of the policy and process. This way you have more context when looking at the responses to the Seneca Nation or Virginia tribes. It's really just to keep everyone in the loop.

Please let me know if you have any other comments or questions.

Thank you!

Renee Bryant (she/her)
Source Water Protection Team Lead
EPA Region 3
215-814-2137
https://www.epa.gov/sourcewaterprotection

From: Rowsey, Kevin <rowsey.kevin@epa.gov>
Sent: Wednesday, April 28, 2021 8:50 AM
To: Dangelo, AJ <Dangelo.Aj@epa.gov>
Cc: Bryant, Renee <bryant.renee@epa.gov>
Subject: RE: Roulette Oil & Gas

Honestly, I'm not sure. I think she wanted to give you and Kelly an update on how we've been approaching these consultations with coordination from OCTEA. We're currently consulting with the Seneca Nation for Roulette & Catalyst Energy. Phil Yeany has the Catalyst permit. I've copied Renee so she might provide a little more clarity.

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From: Dangelo, AJ <Dangelo.Aj@epa.gov>
Sent: Wednesday, April 28, 2021 8:42 AM
To: Rowsey, Kevin <rowsey.kevin@epa.gov>
Subject: RE: Roulette Oil & Gas

Kevin:

Thanks for the update. While on the subject . . . do you know what the Agenda items are for the 5/11/2021 Teams Meeting that Renee Bryant scheduled regarding the Tribal Consultation process in this matter ?

Sincerely,

A.J. D'Angelo

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From: Rowsey, Kevin <rowsey.kevin@epa.gov>
Sent: Wednesday, April 28, 2021 8:34 AM
To: Dangelo, AJ <Dangelo.Aj@epa.gov>
Subject: RE: Roulette Oil & Gas

Hey A.J.,

I'm still working on the Response to Comments for Seneca Nation. They're pretty technical with multiple "parts" per comment. I should be wrapping it up though by next week. As for the Response to Comments for the public, I have a meeting with HQ and Cadmus today at 10:00. HQ has a contract with Cadmus for the UIC Program and they're encouraging the Regions to use the contract. Cadmus is going to help with our RTC for the public. They'll organize the comments and try to respond to most of the comments. Although, they have said that the Region may need to respond to more technical comments. Hopefully this will expedite the process! We had 40 people comment on the draft permit, with several submissions from a few of the commenters. So it's a big lift and we could definitely use Cadmus's help.

I'll let you know how we're doing with this process. And I will definitely need your assistance for the RTC for the Seneca Nation. I'll send it over as soon as I'm finished responding. Unless you'd like me to share what I have right now? Whatever you feel comfortable with!

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From: Dangelo, AJ <Dangelo.Aj@epa.gov>
Sent: Wednesday, April 28, 2021 8:14 AM
To: Rowsey, Kevin <rowsey.kevin@epa.gov>
Subject: RE: Roulette Oil & Gas

Kevin:

Haven't heard from you on this matter in about 6 weeks. I've been crazy busy too . . . so no apologies . . . but you did previously express a desire to get ORC input on the Tribal and Public comment responses that you had then just started to work on when you last communicated w/me.

What's the scoop these days ? Do you still need/want my assistance ?

Please reach out if you need anything. Otherwise, I have plenty of other irons in the fire (so to speak) that can keep me quite busy !

Sincerely,

A.J. D'Angelo

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From: Rowsey, Kevin <rowsey.kevin@epa.gov>
Sent: Tuesday, March 16, 2021 4:40 PM
To: Dangelo, AJ <Dangelo.Aj@epa.gov>
Subject: RE: Roulette Oil & Gas

Hi A.J,

We received comments from the Seneca Nation regarding the proposed Roulette injection well. This isn't the way we thought this was going to work (we thought we would give them a presentation and have a back and forth conversation with them). Nevertheless, they submitted comments that I'm starting to respond to this week. I've attached their comments. They are pretty lengthy and technical so it may take some time for me to answer them. Brian Hamilton, the R3 tribal coordinator, told me it would probably be better to respond to the Seneca Nation's comments separately from the general public's comments. In regards to the general public, I have had around 60 people reach out about this permit of which about 28 people actually submitted their comments. I'll definitely need to start working with you in all these responses but I can take the first attempt at answering them and then run everything by you. Sorry, I should have kept you more up-to-date with what's going on but it's been kind of a whirlwind. I'm just taking it one day at a time ☺

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From: Dangelo, AJ <Dangelo.Aj@epa.gov>
Sent: Tuesday, March 16, 2021 4:32 PM
To: Rowsey, Kevin <rowsey.kevin@epa.gov>
Subject: Roulette Oil & Gas

Kevin:

Just wanted to check in to see how the whole Tribal Consultation process is playing out in **Roulette Oil & Gas** . . . and whether the extended general comment period has resulted in numerous additional comments that are above and beyond the typical norm.

Sincerely,

A.J. D'Angelo

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