To: Iani, L. John (Perkins Coie)[JIani@perkinscoie.com]
Cc: Shaw, Hanh[Shaw.Hanh@epa.gov]; Lance.Tolson@shell.com[Lance.Tolson@shell.com]; Greg.Horner@shell.com[Greg.Horner@shell.com]
From: Owens, Kim
Sent: Thur 6/26/2014 6:26:57 PM
Subject: RE: Shell Information Regarding Mud Line Cellar Construction and ODCE Analyses

Unfortunately, I am not available to discuss this week after all. In addition, we are in the process of analyzing the technical/modeling information that Shell submitted and we will not be in a position to provide any responses until that analysis is complete. - Kim

From: Iani, L. John (Perkins Coie) [mailto:JIani@perkinscoie.com]
Sent: Thursday, June 26, 2014 8:48 AM
To: Owens, Kim
Cc: Lance.Tolson@shell.com; Greg.Horner@shell.com
Subject: RE: Shell Information Regarding Mud Line Cellar Construction and ODCE Analyses

Good Morning Kim,

Lance and I are available today and tomorrow for a call if that fits your schedule. Next week, Lance is available on Monday, Tuesday or Wednesday. I head to Bristol Bay on Monday but could do a call next Wednesday. Please let us know if there is a time convenient and I will set up the conference call.

Thanks,

John

From: Owens, Kim [mailto:Owens.Kim@epa.gov]
Sent: Thursday, June 19, 2014 1:02 PM
To: Iani, L. John (Perkins Coie)
Cc: Lance.Tolson@shell.com; Greg.Horner@shell.com
Subject: RE: Shell Information Regarding Mud Line Cellar Construction and ODCE Analyses

Hello John,

Thank you for your voicemail and for providing this information. I will forward it to the appropriate people in Region 10's Office of Water and the NPDES permitting program. Please be reminded that EPA is responsible for making the final determination of whether this information is entitled to confidential treatment under 40 C.F.R. Part 2. We would not release any information, however, without providing Shell with notice and an opportunity to respond.

We are currently occupied at the staff level in finalizing the Ninth Circuit brief in AEWC v. EPA, while also considering revisions to the draft geotechnical permit. We'll be in better position to address the other questions in your voicemail later next week. Thanks, - Kim

From: Iani, L. John (Perkins Coie) [mailto:JIani@perkinscoie.com]
Sent: Thursday, June 19, 2014 10:15 AM
To: Owens, Kim
Cc: Lance.Tolson@shell.com; Greg.Horner@shell.com
Subject: Shell Information Regarding Mud Line Cellar Construction and ODCE Analyses

Good Morning Kim,

Attached please find Shell's Technical Memorandum and supporting analyses of its proposed construction of Mud Line Cellars (MLC) utilizing the "digger" technology Shell described to the Region earlier. We have labeled this information as Confidential Business Information (CBI) because Shell's analyses is unique to its exploration strategy. We look forward to hearing from you regarding this information and please let me know if there are others at Region 10 who should receive these documents.

Thank you,

John

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