Appointment

From: Marie Bradshaw Durrant [MBDurrant@rqn.com]
Sent: 3/19/2019 10:40:14 PM
To: Marie Bradshaw Durrant [MBDurrant@rqn.com]; 'Adrienne.Sandoval@andeavor.com' [Adrienne.Sandoval@andeavor.com]; 'Andrea.Olsen@Simplot.com' [Andrea.Olsen@Simplot.com]; 'Angela.Zivkovich@anadarko.com' [Angela.Zivkovich@anadarko.com]; Beeler, Cindy [Beeler.Cindy@epa.gov]; 'CColclasure@bwenergylaw.com' [CColclasure@bwenergylaw.com]; 'Chad.Schlichtemeier@anadarko.com' [Chad.Schlichtemeier@anadarko.com]; 'Daniel.D.Pring@andeavor.com' [Daniel.D.Pring@andeavor.com]; 'Djordan@newfield.com' [Djordan@newfield.com]; Dresser, Chris [Dresser.Chris@epa.gov]; 'Eoman@altamontenergy.com' [Eoman@altamontenergy.com]; 'James.woodall@encana.com' [James.woodall@encana.com]; 'Jean.semborski@cop.com' [Jean.semborski@cop.com]; 'Jhirschi@enervest.net' [Jhirschi@enervest.net]; 'John.Spencer@simplot.com' [John.Spencer@simplot.com]; 'Karen_Pratt@xtoenergy.com' [Karen_Pratt@xtoenergy.com]; 'Lolsen@altamontenergy.com' [Lolsen@altamontenergy.com]; 'Rhammer@SLRconsulting.com' [Rhammer@SLRconsulting.com]; 'Ryan.Clerico@enefit.com' [Ryan.Clerico@enefit.com]; 'Ryan.Swanson@epenergy.com' [Ryan.Swanson@epenergy.com]; 'Ryan@kairosaerospace.com' [Ryan@kairosaerospace.com]; 'Spencer_Kimball@eogresources.com' [Spencer_Kimball@eogresources.com]; 'Thomas.H.Gibbons@andeavor.com' [Thomas.H.Gibbons@andeavor.com]; 'aaverett@sunrise-eng.com' [aaverett@sunrise-eng.com]; 'amatheson@utah.gov' [amatheson@utah.gov]; 'amyc@utetribe.com' [amyc@utetribe.com]; 'ashley@publiclandsolutions.org' [ashley@publiclandsolutions.org]; Bean, Clayton [bean.clayton@epa.gov]; 'bmensinger@trinityconsultants.com' [bmensinger@trinityconsultants.com]; 'bstringer@uintah.utah.gov' [bstringer@uintah.utah.gov]; 'chelsea.cantrelle@epenergy.com' [chelsea.cantrelle@epenergy.com]; 'corey.jones@epenergy.com' [corey.jones@epenergy.com]; 'cpennell@utah.gov' [cpennell@utah.gov]; 'dbrown@tricountyhealth.com' [dbrown@tricountyhealth.com]; 'debbie@breatheutah.org' [debbie@breatheutah.org]; 'dmcneill@utah.gov' [dmcneill@utah.gov]; 'eehrmantraut@SLRconsulting.com' [eehrmantraut@SLRconsulting.com]; 'evernon@blm.gov' [evernon@blm.gov]; Garvey, Megan [garvey.megan@epa.gov]; 'gtodd@duchesne.utah.gov' [gtodd@duchesne.utah.gov]; 'huy.tran@usu.edu' [huy.tran@usu.edu]; Jackson, Scott [Jackson.Scott@epa.gov]; 'jmathis@tricountyhealth.com' [jmathis@tricountyhealth.com]; 'jmcqueen@crescentpointenergy.com' [jmcqueen@crescentpointenergy.com]; **Ex. 6 Personal Privacy (PP)** 'joe.sager@epenergy.com' [joe.sager@epenergy.com]; 'jpatterson@ndnlaw.com' [jpatterson@ndnlaw.com]; 'jwoodland@crescentpointenergy.com' [jwoodland@crescentpointenergy.com]; 'kburdick@Duchesne.utah.gov' [kburdick@Duchesne.utah.gov]; Lexie Wilson [lexiewilson@utah.gov]; 'lonnief@utetribe.com' [lonnief@utetribe.com]; 'marc.mansfield@usu.edu' [marc.mansfield@usu.edu]; 'mariek@utetribe.com' [mariek@utetribe.com]; mberger@utah.gov; miken@utetribe.com; minnieg@utetribe.com; Morales, Monica [Morales.Monica@epa.gov]; 'mstewart@redleafinc.com' [mstewart@redleafinc.com]; Nancy Daher [ndaher@utah.gov]; 'rhrenko-browning@utahpetroleum.org' [rhrenko-browning@utahpetroleum.org]; 'rpage@ie-cos.com' [rpage@ie-cos.com]; 'scottchew@le.utah.gov' [scottchew@le.utah.gov]; 'seth.lyman@usu.edu' [seth.lyman@usu.edu]; Smith, Claudia [Smith.Claudia@epa.gov]; 'ssiffring@westernenergyalliance.org' [ssiffring@westernenergyalliance.org]; 'svance@utah.gov' [svance@utah.gov]; 'trang.tran@usu.edu' [trang.tran@usu.edu]; 'ttodd@utah.gov' [ttodd@utah.gov]; 'twiseman@utah.gov' [twiseman@utah.gov]; 'val.oman@epenergy.com' [val.oman@epenergy.com]; 'vince.christensen@simplot.com' [vince.christensen@simplot.com]; 'wesadams@utah.gov' [wesadams@utah.gov]; 'woswald@utah.gov' [woswald@utah.gov]
CC: 'Douglas.Jordan@encana.com' [Douglas.Jordan@encana.com]; Tonnesen, Gail [Tonnesen.Gail@epa.gov]

Subject: Uinta Basin Ozone Working Group Meeting - In Person If Possible!
Location: 50 E 200 S, Roosevelt, UT 84066

Start: 4/11/2019 8:30:00 PM
End: 4/11/2019 10:30:00 PM
Show Time As: Tentative

Recurrence: (none)

Appointment

From: Doris Vanden Akker [dvandenakker@RQN.COM]
Sent: 10/18/2018 2:51:38 PM
To: 'aaverett@sunrise-eng.com' [aaverett@sunrise-eng.com]; 'Adrienne.Sandoval@andeavor.com' [Adrienne.Sandoval@andeavor.com]; 'amyc@utetribe.com' [amyc@utetribe.com]; 'Angela.Zivkovich@anadarko.com' [Angela.Zivkovich@anadarko.com]; 'ashley@publiclandsolutions.org' [ashley@publiclandsolutions.org]; 'bstringer@uintah.utah.gov' [bstringer@uintah.utah.gov]; 'Rhammer@SLRconsulting.com' [Rhammer@SLRconsulting.com]; 'Chad.Schlichtemeier@anadarko.com' [Chad.Schlichtemeier@anadarko.com]; 'chelsea.cantrelle@epenergy.com' [chelsea.cantrelle@epenergy.com]; Dresser, Chris [Dresser.Chris@epa.gov]; Beeler, Cindy [Beeler.Cindy@epa.gov]; Smith, Claudia [Smith.Claudia@epa.gov]; 'dbrown@tricountyhealth.com' [dbrown@tricountyhealth.com]; 'dmcneill@utah.gov' [dmcneill@utah.gov]; 'debbie@breatheutah.org' [debbie@breatheutah.org]; 'Djordan@newfield.com' [Djordan@newfield.com]; 'Eoman@altamontenergy.com' [Eoman@altamontenergy.com]; 'eehrmantraut@SLRconsulting.com' [eehrmantraut@SLRconsulting.com]; 'evernon@blm.gov' [evernon@blm.gov]; 'gtodd@duchesne.utah.gov' [gtodd@duchesne.utah.gov]; 'huy.tran@usu.edu' [huy.tran@usu.edu]; 'jpatterson@ndnlaw.com' [jpatterson@ndnlaw.com]; 'j.woodland@crescentpointenergy.com' [j.woodland@crescentpointenergy.com]; 'joe.sager@epenergy.com' [joe.sager@epenergy.com]; 'John.Spencer@simplot.com' [John.Spencer@simplot.com]; 'jmathis@tricountyhealth.com' [jmathis@tricountyhealth.com]; 'Jhirschi@enervest.net' [Jhirschi@enervest.net]; 'kburdick@Duchesne.utah.gov' [kburdick@Duchesne.utah.gov]; 'kvantassell@le.utah.gov' [kvantassell@le.utah.gov]; 'Lolsen@altamontenergy.com' [Lolsen@altamontenergy.com]; Lexie Wilson [lexiewilson@utah.gov]; 'lonnief@utetribe.com' [lonnief@utetribe.com]; Marie Durrant [MBDurrant@rqn.com]; 'mariek@utetribe.com' [mariek@utetribe.com]; 'marc.mansfield@usu.edu' [marc.mansfield@usu.edu]; mberger@utah.gov; 'mstewart@redleafinc.com' [mstewart@redleafinc.com]; Garvey, Megan [garvey.megan@epa.gov]; miken@utetribe.com; minnieg@utetribe.com; Morales, Monica [Morales.Monica@epa.gov]; 'rpage@ie-cos.com' [rpage@ie-cos.com]; 'rikki.hrenko@enefitamericanoil.com' [rikki.hrenko@enefitamericanoil.com]; 'Ryan.Clerico@enefit.com' [Ryan.Clerico@enefit.com]; 'scottchew@le.utah.gov' [scottchew@le.utah.gov]; 'seth.lyman@usu.edu' [seth.lyman@usu.edu]; 'svance@utah.gov' [svance@utah.gov]; 'Spencer_Kimball@eogresources.com' [Spencer_Kimball@eogresources.com]; 'ssiffring@westernenergyalliance.org' [ssiffring@westernenergyalliance.org]; 'Thomas.H.Gibbons@andeavor.com' [Thomas.H.Gibbons@andeavor.com]; 'trang.tran@usu.edu' [trang.tran@usu.edu]; 'ttodd@utah.gov' [ttodd@utah.gov]; 'val.oman@epenergy.com' [val.oman@epenergy.com]; 'vince.christensen@simplot.com' [vince.christensen@simplot.com]; 'woswald@utah.gov' [woswald@utah.gov]; [Ex. 6 Personal Privacy (PP)]

Subject: Canceled: 4. Most effective reduction targets: Identifying most effective emission reduction targets and measures
Location: Uinta Basin Ozone Working Group

Start: 10/24/2018 4:30:00 PM
End: 10/24/2018 5:00:00 PM
Show Time As: Free

Importance: High

Recurrence: (none)

Appointment

From: Doris Vanden Akker [dvandenakker@RQN.COM]
Sent: 10/18/2018 2:51:44 PM
To: 'aaverett@sunrise-eng.com' [aaverett@sunrise-eng.com]; 'Adrienne.Sandoval@andeavor.com' [Adrienne.Sandoval@andeavor.com]; 'amyc@utetribe.com' [amyc@utetribe.com]; 'Angela.Zivkovich@anadarko.com' [Angela.Zivkovich@anadarko.com]; 'ashley@publiclandsolutions.org' [ashley@publiclandsolutions.org]; 'bstringer@uintah.utah.gov' [bstringer@uintah.utah.gov]; 'Rhammer@SLRconsulting.com' [Rhammer@SLRconsulting.com]; 'Chad.Schlichtemeier@anadarko.com' [Chad.Schlichtemeier@anadarko.com]; 'chelsea.cantrelle@epenergy.com' [chelsea.cantrelle@epenergy.com]; Dresser, Chris [Dresser.Chris@epa.gov]; Beeler, Cindy [Beeler.Cindy@epa.gov]; Smith, Claudia [Smith.Claudia@epa.gov]; 'dbrown@tricountyhealth.com' [dbrown@tricountyhealth.com]; 'dmcneill@utah.gov' [dmcneill@utah.gov]; 'debbie@breatheutah.org' [debbie@breatheutah.org]; 'Djordan@newfield.com' [Djordan@newfield.com]; 'Eoman@altamontenergy.com' [Eoman@altamontenergy.com]; 'eehrmantraut@SLRconsulting.com' [eehrmantraut@SLRconsulting.com]; 'evernon@blm.gov' [evernon@blm.gov]; 'gtodd@duchesne.utah.gov' [gtodd@duchesne.utah.gov]; 'huy.tran@usu.edu' [huy.tran@usu.edu]; 'jpatterson@ndnlaw.com' [jpatterson@ndnlaw.com]; 'j.woodland@crescentpointenergy.com' [j.woodland@crescentpointenergy.com]; 'joe.sager@epenergy.com' [joe.sager@epenergy.com]; 'John.Spencer@simplot.com' [John.Spencer@simplot.com]; 'jmathis@tricountyhealth.com' [jmathis@tricountyhealth.com]; 'Jhirschi@enervest.net' [Jhirschi@enervest.net]; 'kburdick@Duchesne.utah.gov' [kburdick@Duchesne.utah.gov]; 'kvantassell@le.utah.gov' [kvantassell@le.utah.gov]; 'Lolsen@altamontenergy.com' [Lolsen@altamontenergy.com]; Lexie Wilson [lexiewilson@utah.gov]; 'lonnief@utetribe.com' [lonnief@utetribe.com]; Marie Durrant [MBDurrant@rqn.com]; 'mariek@utetribe.com' [mariek@utetribe.com]; 'marc.mansfield@usu.edu' [marc.mansfield@usu.edu]; mberger@utah.gov; 'mstewart@redleafinc.com' [mstewart@redleafinc.com]; Garvey, Megan [garvey.megan@epa.gov]; miken@utetribe.com; minnieg@utetribe.com; Morales, Monica [Morales.Monica@epa.gov]; 'rpage@ie-cos.com' [rpage@ie-cos.com]; 'rikki.hrenko@enefitamericanoil.com' [rikki.hrenko@enefitamericanoil.com]; 'Ryan.Clerico@enefit.com' [Ryan.Clerico@enefit.com]; 'scottchew@le.utah.gov' [scottchew@le.utah.gov]; 'seth.lyman@usu.edu' [seth.lyman@usu.edu]; 'svance@utah.gov' [svance@utah.gov]; 'Spencer_Kimball@eogresources.com' [Spencer_Kimball@eogresources.com]; 'ssiffring@westernenergyalliance.org' [ssiffring@westernenergyalliance.org]; 'Thomas.H.Gibbons@andeavor.com' [Thomas.H.Gibbons@andeavor.com]; 'trang.tran@usu.edu' [trang.tran@usu.edu]; 'ttodd@utah.gov' [ttodd@utah.gov]; 'val.oman@epenergy.com' [val.oman@epenergy.com]; 'vince.christensen@simplot.com' [vince.christensen@simplot.com]; 'woswald@utah.gov' [woswald@utah.gov]; **Ex. 6 Personal Privacy (PP)**

Subject: Canceled: 5. Accounting for outside factors: Accounting for factors outside of traditional regulation
Location: Uinta Basin Ozone Working Group

Start: 10/24/2018 3:00:00 PM
End: 10/24/2018 4:00:00 PM
Show Time As: Free

Importance: High

Recurrence: (none)

Appointment

From: Marie Bradshaw Durrant [MBDurrant@rqn.com]
Sent: 1/9/2019 4:20:26 PM
To: 'aaverett@sunrise-eng.com' [aaverett@sunrise-eng.com]; 'Adrienne.Sandoval@andeavor.com' [Adrienne.Sandoval@andeavor.com]; 'amyc@utetribe.com' [amyc@utetribe.com]; 'Angela.Zivkovich@anadarko.com' [Angela.Zivkovich@anadarko.com]; 'ashley@publiclandsolutions.org' [ashley@publiclandsolutions.org]; 'bstringer@uintah.utah.gov' [bstringer@uintah.utah.gov]; 'Rhammer@SLRconsulting.com' [Rhammer@SLRconsulting.com]; 'bmensinger@trinityconsultants.com' [bmensinger@trinityconsultants.com]; 'Chad.Schlichtemeier@anadarko.com' [Chad.Schlichtemeier@anadarko.com]; 'chelsea.cantrelle@epenergy.com' [chelsea.cantrelle@epenergy.com]; 'CColclasure@bwenergylaw.com' [CColclasure@bwenergylaw.com]; Dresser, Chris [Dresser.Chris@epa.gov]; Beeler, Cindy [Beeler.Cindy@epa.gov]; Smith, Claudia [Smith.Claudia@epa.gov]; Bean, Clayton [bean.clayton@epa.gov]; 'corey.jones@epenergy.com' [corey.jones@epenergy.com]; 'Daniel.D.Pring@andeavor.com' [Daniel.D.Pring@andeavor.com]; 'dbrown@tricountyhealth.com' [dbrown@tricountyhealth.com]; 'dmcneill@utah.gov' [dmcneill@utah.gov]; 'debbie@breatheutah.org' [debbie@breatheutah.org]; 'Djordan@newfield.com' [Djordan@newfield.com]; 'Eoman@altamontenergy.com' [Eoman@altamontenergy.com]; 'eehrmantraut@SLRconsulting.com' [eehrmantraut@SLRconsulting.com]; 'evernon@blm.gov' [evernon@blm.gov]; 'gtodd@duchesne.utah.gov' [gtodd@duchesne.utah.gov]; 'huy.tran@usu.edu' [huy.tran@usu.edu]; 'jpatterson@ndnlaw.com' [jpatterson@ndnlaw.com]; 'Jwoodall@newfield.com' [Jwoodall@newfield.com]; 'jwoodland@crescentpointenergy.com' [jwoodland@crescentpointenergy.com]; 'Jean.semborski@cop.com' [Jean.semborski@cop.com]; 'joe.sager@epenergy.com' [joe.sager@epenergy.com]; 'John.Spencer@simplot.com' [John.Spencer@simplot.com]; Ex. 6 Personal Privacy (PP) ; 'jmathis@tricountyhealth.com' [jmathis@tricountyhealth.com]; 'Jhirschi@enervest.net' [Jhirschi@enervest.net]; 'Karen_Pratt@xtoenergy.com' [Karen_Pratt@xtoenergy.com]; 'kburdick@Duchesne.utah.gov' [kburdick@Duchesne.utah.gov]; 'kvantassell@le.utah.gov' [kvantassell@le.utah.gov]; 'Lolsen@altamontenergy.com' [Lolsen@altamontenergy.com]; Lexie Wilson [lexiewilson@utah.gov]; 'lonnief@utetribe.com' [lonnief@utetribe.com]; 'mariek@utetribe.com' [mariek@utetribe.com]; 'marc.mansfield@usu.edu' [marc.mansfield@usu.edu]; mberger@utah.gov; 'mstewart@redleafinc.com' [mstewart@redleafinc.com]; Garvey, Megan [garvey.megan@epa.gov]; miken@utetribe.com; minnieg@utetribe.com; Morales, Monica [Morales.Monica@epa.gov]; 'rpage@ie-cos.com' [rpage@ie-cos.com]; 'rhrenko-browning@utahpetroleum.org' [rhrenko-browning@utahpetroleum.org]; 'Ryan.Clerico@enefit.com' [Ryan.Clerico@enefit.com]; 'Ryan@kairosaerospace.com' [Ryan@kairosaerospace.com]; 'Ryan.Swanson@epenergy.com' [Ryan.Swanson@epenergy.com]; 'scottchew@le.utah.gov' [scottchew@le.utah.gov]; Jackson, Scott [Jackson.Scott@epa.gov]; 'seth.lyman@usu.edu' [seth.lyman@usu.edu]; 'svance@utah.gov' [svance@utah.gov]; 'Spencer_Kimball@eogresources.com' [Spencer_Kimball@eogresources.com]; 'ssiffring@westernenergyalliance.org' [ssiffring@westernenergyalliance.org]; 'Thomas.H.Gibbons@andeavor.com' [Thomas.H.Gibbons@andeavor.com]; 'trang.tran@usu.edu' [trang.tran@usu.edu]; 'ttodd@utah.gov' [ttodd@utah.gov]; 'val.oman@epenergy.com' [val.oman@epenergy.com]; 'vince.christensen@simplot.com' [vince.christensen@simplot.com]; 'woswald@utah.gov' [woswald@utah.gov]; 'jmcqueen@crescentpointenergy.com' [jmcqueen@crescentpointenergy.com]; 'Andrea.Olsen@Simplot.com' [Andrea.Olsen@Simplot.com]; 'cpennell@utah.gov' [cpennell@utah.gov]; Nancy Daher [ndaher@utah.gov]; Doris Vanden Akker [dvandenakker@RQN.COM]; Gabriel Niculescu [niculescu@RQN.COM]

Subject: Uinta Basin Ozone Working Group Meeting
Location: Vernal, Salt Lake City, Denver

Start: 2/12/2019 9:00:00 PM
End: 2/12/2019 10:00:00 PM
Show Time As: Tentative

Recurrence: (none)

Appointment

From: Doris Vanden Akker [dvandenakker@RQN.COM]
Sent: 10/18/2018 2:51:49 PM
To: 'aaverett@sunrise-eng.com' [aaverett@sunrise-eng.com]; 'Adrienne.Sandoval@andeavor.com' [Adrienne.Sandoval@andeavor.com]; 'amyc@utetribe.com' [amyc@utetribe.com]; 'Angela.Zivkovich@anadarko.com' [Angela.Zivkovich@anadarko.com]; 'ashley@publiclandsolutions.org' [ashley@publiclandsolutions.org]; 'bstringer@uintah.utah.gov' [bstringer@uintah.utah.gov]; 'Rhammer@SLRconsulting.com' [Rhammer@SLRconsulting.com]; 'Chad.Schlichtemeier@anadarko.com' [Chad.Schlichtemeier@anadarko.com]; 'chelsea.cantrelle@epenergy.com' [chelsea.cantrelle@epenergy.com]; Dresser, Chris [Dresser.Chris@epa.gov]; Beeler, Cindy [Beeler.Cindy@epa.gov]; Smith, Claudia [Smith.Claudia@epa.gov]; 'dbrown@tricountyhealth.com' [dbrown@tricountyhealth.com]; 'dmcneill@utah.gov' [dmcneill@utah.gov]; 'debbie@breatheutah.org' [debbie@breatheutah.org]; 'Djordan@newfield.com' [Djordan@newfield.com]; 'Eoman@altamontenergy.com' [Eoman@altamontenergy.com]; 'eehrmantraut@SLRconsulting.com' [eehrmantraut@SLRconsulting.com]; 'evernon@blm.gov' [evernon@blm.gov]; 'gtodd@duchesne.utah.gov' [gtodd@duchesne.utah.gov]; 'huy.tran@usu.edu' [huy.tran@usu.edu]; 'jpatterson@ndnlaw.com' [jpatterson@ndnlaw.com]; 'j.woodland@crescentpointenergy.com' [j.woodland@crescentpointenergy.com]; 'joe.sager@epenergy.com' [joe.sager@epenergy.com]; 'John.Spencer@simplot.com' [John.Spencer@simplot.com]; 'jmathis@tricountyhealth.com' [jmathis@tricountyhealth.com]; 'Jhirschi@enervest.net' [Jhirschi@enervest.net]; 'kburdick@Duchesne.utah.gov' [kburdick@Duchesne.utah.gov]; 'kvantassell@le.utah.gov' [kvantassell@le.utah.gov]; 'Lolsen@altamontenergy.com' [Lolsen@altamontenergy.com]; Lexie Wilson [lexiewilson@utah.gov]; 'lonnief@utetribe.com' [lonnief@utetribe.com]; Marie Durrant [MBDurrant@rqn.com]; 'mariek@utetribe.com' [mariek@utetribe.com]; 'marc.mansfield@usu.edu' [marc.mansfield@usu.edu]; mberger@utah.gov; 'mstewart@redleafinc.com' [mstewart@redleafinc.com]; Garvey, Megan [garvey.megan@epa.gov]; miken@utetribe.com; minnieg@utetribe.com; Morales, Monica [Morales.Monica@epa.gov]; 'rpage@ie-cos.com' [rpage@ie-cos.com]; 'rikki.hrenko@enefitamericanoil.com' [rikki.hrenko@enefitamericanoil.com]; 'Ryan.Clerico@enefit.com' [Ryan.Clerico@enefit.com]; 'scottchew@le.utah.gov' [scottchew@le.utah.gov]; 'seth.lyman@usu.edu' [seth.lyman@usu.edu]; 'svance@utah.gov' [svance@utah.gov]; 'Spencer_Kimball@eogresources.com' [Spencer_Kimball@eogresources.com]; 'ssiffring@westernenergyalliance.org' [ssiffring@westernenergyalliance.org]; 'Thomas.H.Gibbons@andeavor.com' [Thomas.H.Gibbons@andeavor.com]; 'trang.tran@usu.edu' [trang.tran@usu.edu]; 'ttodd@utah.gov' [ttodd@utah.gov]; 'val.oman@epenergy.com' [val.oman@epenergy.com]; 'vince.christensen@simplot.com' [vince.christensen@simplot.com]; 'woswald@utah.gov' [woswald@utah.gov]; Ex. 6 Personal Privacy (PP)

Subject: Canceled: 6. Jurisdictional alignment: Aligning regulations/credits/actions across jurisdictions/air sheds
Location: Uinta Basin Ozone Working Group

Start: 10/24/2018 7:00:00 PM
End: 10/24/2018 8:00:00 PM
Show Time As: Free

Importance: High

Recurrence: (none)

Appointment

From: Doris Vanden Akker [dvandenakker@RQN.COM]
Sent: 10/18/2018 2:51:22 PM
To: 'aaverett@sunrise-eng.com' [aaverett@sunrise-eng.com]; 'Adrienne.Sandoval@andeavor.com' [Adrienne.Sandoval@andeavor.com]; 'amyc@utetribe.com' [amyc@utetribe.com]; 'Angela.Zivkovich@anadarko.com' [Angela.Zivkovich@anadarko.com]; 'ashley@publiclandsolutions.org' [ashley@publiclandsolutions.org]; 'bstringer@uintah.utah.gov' [bstringer@uintah.utah.gov]; 'Rhammer@SLRconsulting.com' [Rhammer@SLRconsulting.com]; 'Chad.Schlichtemeier@anadarko.com' [Chad.Schlichtemeier@anadarko.com]; 'chelsea.cantrelle@epenergy.com' [chelsea.cantrelle@epenergy.com]; Dresser, Chris [Dresser.Chris@epa.gov]; Beeler, Cindy [Beeler.Cindy@epa.gov]; Smith, Claudia [Smith.Claudia@epa.gov]; 'dbrown@tricountyhealth.com' [dbrown@tricountyhealth.com]; 'dmcneill@utah.gov' [dmcneill@utah.gov]; 'debbie@breatheutah.org' [debbie@breatheutah.org]; 'Djordan@newfield.com' [Djordan@newfield.com]; 'Eoman@altamontenergy.com' [Eoman@altamontenergy.com]; 'eehrmantraut@SLRconsulting.com' [eehrmantraut@SLRconsulting.com]; 'evernon@blm.gov' [evernon@blm.gov]; 'gtodd@duchesne.utah.gov' [gtodd@duchesne.utah.gov]; 'huy.tran@usu.edu' [huy.tran@usu.edu]; 'jpatterson@ndnlaw.com' [jpatterson@ndnlaw.com]; 'j.woodland@crescentpointenergy.com' [j.woodland@crescentpointenergy.com]; 'joe.sager@epenergy.com' [joe.sager@epenergy.com]; 'John.Spencer@simplot.com' [John.Spencer@simplot.com]; 'jmathis@tricountyhealth.com' [jmathis@tricountyhealth.com]; 'Jhirschi@enervest.net' [Jhirschi@enervest.net]; 'kburdick@Duchesne.utah.gov' [kburdick@Duchesne.utah.gov]; 'kvantassell@le.utah.gov' [kvantassell@le.utah.gov]; 'Lolsen@altamontenergy.com' [Lolsen@altamontenergy.com]; Lexie Wilson [lexiewilson@utah.gov]; 'lonnief@utetribe.com' [lonnief@utetribe.com]; Marie Durrant [MBDurrant@rqn.com]; 'mariek@utetribe.com' [mariek@utetribe.com]; 'marc.mansfield@usu.edu' [marc.mansfield@usu.edu]; mberger@utah.gov; 'mstewart@redleafinc.com' [mstewart@redleafinc.com]; Garvey, Megan [garvey.megan@epa.gov]; miken@utetribe.com; minnieg@utetribe.com; Morales, Monica [Morales.Monica@epa.gov]; 'rpage@ie-cos.com' [rpage@ie-cos.com]; 'rikki.hrenko@enefitamericanoil.com' [rikki.hrenko@enefitamericanoil.com]; 'Ryan.Clerico@enefit.com' [Ryan.Clerico@enefit.com]; 'scottchew@le.utah.gov' [scottchew@le.utah.gov]; 'seth.lyman@usu.edu' [seth.lyman@usu.edu]; 'svance@utah.gov' [svance@utah.gov]; 'Spencer_Kimball@eogresources.com' [Spencer_Kimball@eogresources.com]; 'ssiffring@westernenergyalliance.org' [ssiffring@westernenergyalliance.org]; 'Thomas.H.Gibbons@andeavor.com' [Thomas.H.Gibbons@andeavor.com]; 'trang.tran@usu.edu' [trang.tran@usu.edu]; 'ttodd@utah.gov' [ttodd@utah.gov]; 'val.oman@epenergy.com' [val.oman@epenergy.com]; 'vince.christensen@simplot.com' [vince.christensen@simplot.com]; 'woswald@utah.gov' [woswald@utah.gov]; **Ex. 6 Personal Privacy (PP)**

Subject: Canceled: 1. Immediate proactive reductions: Near-term, proactive actions to reduce ozone and respond to ozone events (industry only)
Location: Uinta Basin Ozone Working Group

Start: 10/24/2018 6:00:00 PM
End: 10/24/2018 7:00:00 PM
Show Time As: Free

Importance: High

Recurrence: (none)

Appointment

From: Doris Vanden Akker [dvandenakker@RQN.COM]
Sent: 2/13/2019 10:39:44 PM
To: 'aaverett@sunrise-eng.com' [aaverett@sunrise-eng.com]; 'Adrienne.Sandoval@andeavor.com' [Adrienne.Sandoval@andeavor.com]; 'amyc@utetribe.com' [amyc@utetribe.com]; 'Angela.Zivkovich@anadarko.com' [Angela.Zivkovich@anadarko.com]; 'ashley@publiclandsolutions.org' [ashley@publiclandsolutions.org]; 'bstringer@uintah.utah.gov' [bstringer@uintah.utah.gov]; 'Rhammer@SLRconsulting.com' [Rhammer@SLRconsulting.com]; 'bmensinger@trinityconsultants.com' [bmensinger@trinityconsultants.com]; 'Chad.Schlichtemeier@anadarko.com' [Chad.Schlichtemeier@anadarko.com]; 'chelsea.cantrelle@epenergy.com' [chelsea.cantrelle@epenergy.com]; 'CColclasure@bwenergylaw.com' [CColclasure@bwenergylaw.com]; Dresser, Chris [Dresser.Chris@epa.gov]; Beeler, Cindy [Beeler.Cindy@epa.gov]; Smith, Claudia [Smith.Claudia@epa.gov]; Bean, Clayton [bean.clayton@epa.gov]; 'corey.jones@epenergy.com' [corey.jones@epenergy.com]; 'Daniel.D.Pring@andeavor.com' [Daniel.D.Pring@andeavor.com]; 'dbrown@tricountyhealth.com' [dbrown@tricountyhealth.com]; 'dmcneill@utah.gov' [dmcneill@utah.gov]; 'debbie@breatheutah.org' [debbie@breatheutah.org]; 'Djordan@newfield.com' [Djordan@newfield.com]; 'Eoman@altamontenergy.com' [Eoman@altamontenergy.com]; 'eehrmantraut@SLRconsulting.com' [eehrmantraut@SLRconsulting.com]; 'evernon@blm.gov' [evernon@blm.gov]; 'gtodd@duchesne.utah.gov' [gtodd@duchesne.utah.gov]; 'huy.tran@usu.edu' [huy.tran@usu.edu]; 'jpatterson@ndnlaw.com' [jpatterson@ndnlaw.com]; 'Jwoodall@newfield.com' [Jwoodall@newfield.com]; 'jwoodland@crescentpointenergy.com' [jwoodland@crescentpointenergy.com]; 'Jean.semborski@cop.com' [Jean.semborski@cop.com]; 'joe.sager@epenergy.com' [joe.sager@epenergy.com]; 'John.Spencer@simplot.com' [John.Spencer@simplot.com]; Ex. 6 Personal Privacy (PP) 'jmathis@tricountyhealth.com' [jmathis@tricountyhealth.com]; 'Jhirschi@enervest.net' [Jhirschi@enervest.net]; 'Karen_Pratt@xtoenergy.com' [Karen_Pratt@xtoenergy.com]; 'kburdick@Duchesne.utah.gov' [kburdick@Duchesne.utah.gov]; 'Lolsen@altamontenergy.com' [Lolsen@altamontenergy.com]; Lexie Wilson [lexiewilson@utah.gov]; 'lonnief@utetribe.com' [lonnief@utetribe.com]; Marie Bradshaw Durrant [MBDurrant@rqn.com]; 'mariek@utetribe.com' [mariek@utetribe.com]; 'marc.mansfield@usu.edu' [marc.mansfield@usu.edu]; mberger@utah.gov; 'mstewart@redleafinc.com' [mstewart@redleafinc.com]; Garvey, Megan [garvey.megan@epa.gov]; miken@utetribe.com; minnieg@utetribe.com; Morales, Monica [Morales.Monica@epa.gov]; 'rpage@ie-cos.com' [rpage@ie-cos.com]; 'rhrenko-browning@utahpetroleum.org' [rhrenko-browning@utahpetroleum.org]; 'Ryan.Clerico@enefit.com' [Ryan.Clerico@enefit.com]; 'Ryan@kairosaerospace.com' [Ryan@kairosaerospace.com]; 'Ryan.Swanson@epenergy.com' [Ryan.Swanson@epenergy.com]; 'scottchew@le.utah.gov' [scottchew@le.utah.gov]; Jackson, Scott [Jackson.Scott@epa.gov]; 'seth.lyman@usu.edu' [seth.lyman@usu.edu]; 'svance@utah.gov' [svance@utah.gov]; 'Spencer_Kimball@eogresources.com' [Spencer_Kimball@eogresources.com]; 'ssiffring@westernenergyalliance.org' [ssiffring@westernenergyalliance.org]; 'Thomas.H.Gibbons@andeavor.com' [Thomas.H.Gibbons@andeavor.com]; 'trang.tran@usu.edu' [trang.tran@usu.edu]; 'ttodd@utah.gov' [ttodd@utah.gov]; 'val.oman@epenergy.com' [val.oman@epenergy.com]; 'vince.christensen@simplot.com' [vince.christensen@simplot.com]; 'woswald@utah.gov' [woswald@utah.gov]; 'jmcqueen@crescentpointenergy.com' [jmcqueen@crescentpointenergy.com]; 'Andrea.Olsen@Simplot.com' [Andrea.Olsen@Simplot.com]; 'cpennell@utah.gov' [cpennell@utah.gov]; Nancy Daher [ndaher@utah.gov]; 'amatheson@utah.gov' [amatheson@utah.gov]

Subject: Uinta Basin Ozone Working Group Meeting
Location: Vernal, Salt Lake City, Denver

Start: 3/19/2019 8:00:00 PM
End: 3/19/2019 9:00:00 PM
Show Time As: Tentative

Recurrence: (none)

Appointment

From: Marie Durrant [MBDurrant@rqn.com]
Sent: 9/13/2018 3:18:08 PM
To: Marie Durrant [MBDurrant@rqn.com]; 'aaverett@sunrise-eng.com' [aaverett@sunrise-eng.com]; 'Adrienne.Sandoval@andeavor.com' [Adrienne.Sandoval@andeavor.com]; 'amyc@utetribe.com' [amyc@utetribe.com]; 'ashley@publiclandsolutions.org' [ashley@publiclandsolutions.org]; 'bstringer@uintah.utah.gov' [bstringer@uintah.utah.gov]; Dresser, Chris [Dresser.Chris@epa.gov]; Beeler, Cindy [Beeler.Cindy@epa.gov]; 'dmcneill@utah.gov' [dmcneill@utah.gov]; 'debbie@breatheutah.org' [debbie@breatheutah.org]; 'evernon@blm.gov' [evernon@blm.gov]; 'gtodd@duchesne.utah.gov' [gtodd@duchesne.utah.gov]; 'jpatterson@ndnlaw.com' [jpatterson@ndnlaw.com]; 'jmathis@tricountyhealth.com' [jmathis@tricountyhealth.com]; 'jodyc@utetribe.com' [jodyc@utetribe.com]; 'kvantassell@le.utah.gov' [kvantassell@le.utah.gov]; Lexie Wilson [lexiewilson@utah.gov]; 'lonnief@utetribe.com' [lonnief@utetribe.com]; 'mariek@utetribe.com' [mariek@utetribe.com]; mberger@utah.gov; miken@utetribe.com; minnieg@utetribe.com; 'rpage@ie-cos.com' [rpage@ie-cos.com]; 'Ryan.Clerico@energia.ee' [Ryan.Clerico@energia.ee]; 'scottchew@le.utah.gov' [scottchew@le.utah.gov]; 'seth.lyman@usu.edu' [seth.lyman@usu.edu]; 'svance@utah.gov' [svance@utah.gov]; 'ssiffring@westernenergyalliance.org' [ssiffring@westernenergyalliance.org]; 'woswald@utah.gov' [woswald@utah.gov]; 'joe.sager@epenergy.com' [joe.sager@epenergy.com]; 'chelsea.cantrelle@epenergy.com' [chelsea.cantrelle@epenergy.com]; 'dbrown@tricountyhealth.com' [dbrown@tricountyhealth.com]; 'marc.mansfield@usu.edu' [marc.mansfield@usu.edu]; 'trang.tran@usu.edu' [trang.tran@usu.edu]; 'huy.tran@usu.edu' [huy.tran@usu.edu]; 'j.woodland@crescentpointenergy.com' [j.woodland@crescentpointenergy.com]; Garvey, Megan [garvey.megan@epa.gov]

Subject: Uinta Basin Ozone Working Group Meeting
Location: USU Bingham Building, Room 101, Vernal and Ray Quinney & Nebeker, 36 South State Street, Suite 1400, SLC

Start: 9/25/2018 8:00:00 PM
End: 9/25/2018 10:00:00 PM
Show Time As: Busy

Recurrence: (none)

Appointment

From: Doris Vanden Akker [dvandenakker@RQN.COM]
Sent: 10/18/2018 2:51:29 PM
To: 'aaverett@sunrise-eng.com' [aaverett@sunrise-eng.com]; 'Adrienne.Sandoval@andeavor.com' [Adrienne.Sandoval@andeavor.com]; 'amyc@utetribe.com' [amyc@utetribe.com]; 'Angela.Zivkovich@anadarko.com' [Angela.Zivkovich@anadarko.com]; 'ashley@publiclandsolutions.org' [ashley@publiclandsolutions.org]; 'bstringer@uintah.utah.gov' [bstringer@uintah.utah.gov]; 'Rhammer@SLRconsulting.com' [Rhammer@SLRconsulting.com]; 'Chad.Schlichtemeier@anadarko.com' [Chad.Schlichtemeier@anadarko.com]; 'chelsea.cantrelle@epenergy.com' [chelsea.cantrelle@epenergy.com]; Dresser, Chris [Dresser.Chris@epa.gov]; Beeler, Cindy [Beeler.Cindy@epa.gov]; Smith, Claudia [Smith.Claudia@epa.gov]; 'dbrown@tricountyhealth.com' [dbrown@tricountyhealth.com]; 'dmcneill@utah.gov' [dmcneill@utah.gov]; 'debbie@breatheutah.org' [debbie@breatheutah.org]; 'Djordan@newfield.com' [Djordan@newfield.com]; 'Eoman@altamontenergy.com' [Eoman@altamontenergy.com]; 'eehrmantraut@SLRconsulting.com' [eehrmantraut@SLRconsulting.com]; 'evernon@blm.gov' [evernon@blm.gov]; 'gtodd@duchesne.utah.gov' [gtodd@duchesne.utah.gov]; 'huy.tran@usu.edu' [huy.tran@usu.edu]; 'jpatterson@ndnlaw.com' [jpatterson@ndnlaw.com]; 'j.woodland@crescentpointenergy.com' [j.woodland@crescentpointenergy.com]; 'joe.sager@epenergy.com' [joe.sager@epenergy.com]; 'John.Spencer@simplot.com' [John.Spencer@simplot.com]; 'jmathis@tricountyhealth.com' [jmathis@tricountyhealth.com]; 'Jhirschi@enervest.net' [Jhirschi@enervest.net]; 'kburdick@Duchesne.utah.gov' [kburdick@Duchesne.utah.gov]; 'kvantassell@le.utah.gov' [kvantassell@le.utah.gov]; 'Lolsen@altamontenergy.com' [Lolsen@altamontenergy.com]; Lexie Wilson [lexiewilson@utah.gov]; 'lonnief@utetribe.com' [lonnief@utetribe.com]; Marie Durrant [MBDurrant@rqn.com]; 'mariek@utetribe.com' [mariek@utetribe.com]; 'marc.mansfield@usu.edu' [marc.mansfield@usu.edu]; mberger@utah.gov; 'mstewart@redleafinc.com' [mstewart@redleafinc.com]; Garvey, Megan [garvey.megan@epa.gov]; miken@utetribe.com; minnieg@utetribe.com; Morales, Monica [Morales.Monica@epa.gov]; 'rpage@ie-cos.com' [rpage@ie-cos.com]; 'rikki.hrenko@enefitamericanoil.com' [rikki.hrenko@enefitamericanoil.com]; 'Ryan.Clerico@enefit.com' [Ryan.Clerico@enefit.com]; 'scottchew@le.utah.gov' [scottchew@le.utah.gov]; 'seth.lyman@usu.edu' [seth.lyman@usu.edu]; 'svance@utah.gov' [svance@utah.gov]; 'Spencer_Kimball@eogresources.com' [Spencer_Kimball@eogresources.com]; 'ssiffring@westernenergyalliance.org' [ssiffring@westernenergyalliance.org]; 'Thomas.H.Gibbons@andeavor.com' [Thomas.H.Gibbons@andeavor.com]; 'trang.tran@usu.edu' [trang.tran@usu.edu]; 'ttodd@utah.gov' [ttodd@utah.gov]; 'val.oman@epenergy.com' [val.oman@epenergy.com]; 'vince.christensen@simplot.com' [vince.christensen@simplot.com]; 'woswald@utah.gov' [woswald@utah.gov]; Ex. 6 Personal Privacy (PP)

Subject: Canceled: 2. Crediting voluntary reductions: Credit for voluntary/proactive emission reductions
Location: Uinta Basin Ozone Working Group

Start: 10/24/2018 5:00:00 PM
End: 10/24/2018 5:30:00 PM
Show Time As: Free

Importance: High

Recurrence: (none)

Appointment

From: bstringer@uintah.utah.gov [bstringer@uintah.utah.gov]
Sent: 9/25/2018 10:00:43 PM
To: bstringer@uintah.utah.gov; Garvey, Megan [garvey.megan@epa.gov]; Reed Page [rpage@ie-cos.com]; 'scottchew@le.utah.gov' [scottchew@le.utah.gov]; 'Adrienne.Sandoval@andeavor.com' [adrienne.sandoval@andeavor.com]; 'gtodd@duchesne.utah.gov' [gtodd@duchesne.utah.gov]; 'aaverett@sunrise-eng.com' [aaverett@sunrise-eng.com]; 'woswald@utah.gov' [woswald@utah.gov]; 'kvantassell@le.utah.gov' [kvantassell@le.utah.gov]; 'joe.sager@epenergy.com' [joe.sager@epenergy.com]; 'jodyc@utetribe.com' [jodyc@utetribe.com]; 'ashley@publiclandsolutions.org' [ashley@publiclandsolutions.org]; Lexie Wilson [lexiewilson@utah.gov]; 'chelsea.cantrelle@epenergy.com' [chelsea.cantrelle@epenergy.com]; Dave McNeill [dmcneill@utah.gov]; mberger@utah.gov; 'evernon@blm.gov' [evernon@blm.gov]; miken@utetribe.com; 'seth.lyman@usu.edu' [seth.lyman@usu.edu]; 'jpatterson@ndnlaw.com' [jpatterson@ndnlaw.com]; 'huy.tran@usu.edu' [huy.tran@usu.edu]; 'marc.mansfield@usu.edu' [marc.mansfield@usu.edu]; 'Ryan.Clerico@energia.ee' [ryan.clerico@energia.ee]; Darrin Brown [dbrown@tricountyhealth.com]; 'svance@utah.gov' [svance@utah.gov]; 'lonnief@utetribe.com' [lonnief@utetribe.com]; 'j.woodland@crescentpointenergy.com' [j.woodland@crescentpointenergy.com]; 'trang.tran@usu.edu' [trang.tran@usu.edu]; 'amyc@utetribe.com' [amyc@utetribe.com]; Dresser, Chris [Dresser.Chris@epa.gov]; Jordan Mathis [jmathis@tricountyhealth.com]; minnieg@utetribe.com; 'mariek@utetribe.com' [mariek@utetribe.com]; 'debbie@breatheutah.org' [debbie@breatheutah.org]; 'ssiffring@westernenergyalliance.org' [ssiffring@westernenergyalliance.org]; Beeler, Cindy [Beeler.Cindy@epa.gov]

Subject: Invitation: Uinta Basin Ozone Working Group Meeting @ Wed Oct 24, 2018 2pm - 3pm (MDT) (garvey.megan@epa.gov)
Location: USU Bingham Building, Room 101, Vernal and Ray Quinney & Nebeker, 36 South State Street, Suite 1400, SLC

Start: 10/24/2018 8:00:00 PM
End: 10/24/2018 9:00:00 PM
Show Time As: Busy

Recurrence: (none)

Appointment

From: Doris Vanden Akker [dvandenakker@RQN.COM]
Sent: 10/18/2018 2:51:34 PM
To: 'aaverett@sunrise-eng.com' [aaverett@sunrise-eng.com]; 'Adrienne.Sandoval@andeavor.com' [Adrienne.Sandoval@andeavor.com]; 'amyc@utetribe.com' [amyc@utetribe.com]; 'Angela.Zivkovich@anadarko.com' [Angela.Zivkovich@anadarko.com]; 'ashley@publiclandsolutions.org' [ashley@publiclandsolutions.org]; 'bstringer@uintah.utah.gov' [bstringer@uintah.utah.gov]; 'Rhammer@SLRconsulting.com' [Rhammer@SLRconsulting.com]; 'Chad.Schlichtemeier@anadarko.com' [Chad.Schlichtemeier@anadarko.com]; 'chelsea.cantrelle@epenergy.com' [chelsea.cantrelle@epenergy.com]; Dresser, Chris [Dresser.Chris@epa.gov]; Beeler, Cindy [Beeler.Cindy@epa.gov]; Smith, Claudia [Smith.Claudia@epa.gov]; 'dbrown@tricountyhealth.com' [dbrown@tricountyhealth.com]; 'dmcneill@utah.gov' [dmcneill@utah.gov]; 'debbie@breatheutah.org' [debbie@breatheutah.org]; 'Djordan@newfield.com' [Djordan@newfield.com]; 'Eoman@altamontenergy.com' [Eoman@altamontenergy.com]; 'eehrmantraut@SLRconsulting.com' [eehrmantraut@SLRconsulting.com]; 'evernon@blm.gov' [evernon@blm.gov]; 'gtodd@duchesne.utah.gov' [gtodd@duchesne.utah.gov]; 'huy.tran@usu.edu' [huy.tran@usu.edu]; 'jpatterson@ndnlaw.com' [jpatterson@ndnlaw.com]; 'j.woodland@crescentpointenergy.com' [j.woodland@crescentpointenergy.com]; 'joe.sager@epenergy.com' [joe.sager@epenergy.com]; 'John.Spencer@simplot.com' [John.Spencer@simplot.com]; 'jmathis@tricountyhealth.com' [jmathis@tricountyhealth.com]; 'Jhirschi@enervest.net' [Jhirschi@enervest.net]; 'kburdick@Duchesne.utah.gov' [kburdick@Duchesne.utah.gov]; 'kvantassell@le.utah.gov' [kvantassell@le.utah.gov]; 'Lolsen@altamontenergy.com' [Lolsen@altamontenergy.com]; Lexie Wilson [lexiewilson@utah.gov]; 'lonnief@utetribe.com' [lonnief@utetribe.com]; Marie Durrant [MBDurrant@rqn.com]; 'mariek@utetribe.com' [mariek@utetribe.com]; 'marc.mansfield@usu.edu' [marc.mansfield@usu.edu]; mberger@utah.gov; 'mstewart@redleafinc.com' [mstewart@redleafinc.com]; Garvey, Megan [garvey.megan@epa.gov]; miken@utetribe.com; minnieg@utetribe.com; Morales, Monica [Morales.Monica@epa.gov]; 'rpage@ie-cos.com' [rpage@ie-cos.com]; 'rikki.hrenko@enefitamericanoil.com' [rikki.hrenko@enefitamericanoil.com]; 'Ryan.Clerico@enefit.com' [Ryan.Clerico@enefit.com]; 'scottchew@le.utah.gov' [scottchew@le.utah.gov]; 'seth.lyman@usu.edu' [seth.lyman@usu.edu]; 'svance@utah.gov' [svance@utah.gov]; 'Spencer_Kimball@eogresources.com' [Spencer_Kimball@eogresources.com]; 'ssiffring@westernenergyalliance.org' [ssiffring@westernenergyalliance.org]; 'Thomas.H.Gibbons@andeavor.com' [Thomas.H.Gibbons@andeavor.com]; 'trang.tran@usu.edu' [trang.tran@usu.edu]; 'ttodd@utah.gov' [ttodd@utah.gov]; 'val.oman@epenergy.com' [val.oman@epenergy.com]; 'vince.christensen@simplot.com' [vince.christensen@simplot.com]; 'woswald@utah.gov' [woswald@utah.gov]; Ex. 6 Personal Privacy (PP)

Subject: Canceled: 3. Helpful comparisons: Comparison with other nonattainment areas – successes and things that didn't work
Location: Uinta Basin Ozone Working Group

Start: 10/24/2018 4:00:00 PM
End: 10/24/2018 5:00:00 PM
Show Time As: Free

Importance: High

Recurrence: (none)

Appointment

From: Darrin Brown [dbrown@tricountyhealth.com]
Sent: 10/30/2018 9:51:37 PM
To: Darrin Brown [dbrown@tricountyhealth.com]; Garvey, Megan [garvey.megan@epa.gov]; Reed Page [rpage@ie-cos.com]; 'scottchew@le.utah.gov' [scottchew@le.utah.gov]; 'Adrienne.Sandoval@andeavor.com' [adrienne.sandoval@andeavor.com]; 'gtodd@duchesne.utah.gov' [gtodd@duchesne.utah.gov]; 'aaverett@sunrise-eng.com' [aaverett@sunrise-eng.com]; 'woswald@utah.gov' [woswald@utah.gov]; bstringer@uintah.utah.gov; 'kvantassell@le.utah.gov' [kvantassell@le.utah.gov]; 'joe.sager@epenergy.com' [joe.sager@epenergy.com]; 'jodyc@utetribe.com' [jodyc@utetribe.com]; 'ashley@publiclandsolutions.org' [ashley@publiclandsolutions.org]; Lexie Wilson [lexiewilson@utah.gov]; 'chelsea.cantrelle@epenergy.com' [chelsea.cantrelle@epenergy.com]; Dave McNeill [dmcneill@utah.gov]; mberger@utah.gov; 'evernon@blm.gov' [evernon@blm.gov]; miken@utetribe.com; 'seth.lyman@usu.edu' [seth.lyman@usu.edu]; 'jpatterson@ndnlaw.com' [jpatterson@ndnlaw.com]; 'huy.tran@usu.edu' [huy.tran@usu.edu]; 'marc.mansfield@usu.edu' [marc.mansfield@usu.edu]; 'Ryan.Clerico@energia.ee' [ryan.clerico@energia.ee]; 'svance@utah.gov' [svance@utah.gov]; 'lonnief@utetribe.com' [lonnief@utetribe.com]; 'j.woodland@crescentpointenergy.com' [j.woodland@crescentpointenergy.com]; 'trang.tran@usu.edu' [trang.tran@usu.edu]; 'amyc@utetribe.com' [amyc@utetribe.com]; Dresser, Chris [Dresser.Chris@epa.gov]; Jordan Mathis [jmathis@tricountyhealth.com]; minnieg@utetribe.com; 'mariek@utetribe.com' [mariek@utetribe.com]; 'debbie@breatheutah.org' [debbie@breatheutah.org]; 'ssiffring@westernenergyalliance.org' [ssiffring@westernenergyalliance.org]; Beeler, Cindy [Beeler.Cindy@epa.gov]

Subject: Invitation: Uinta Basin Ozone Working Group Meeting @ Tue Nov 27, 2018 2pm - 3pm (MST) (garvey.megan@epa.gov)
Location: USU Bingham Building, Room 101, Vernal and Ray Quinney & Nebeker, 36 South State Street, Suite 1400, SLC

Start: 11/27/2018 9:00:00 PM
End: 11/27/2018 10:00:00 PM
Show Time As: Busy

Recurrence: (none)

Appointment

From: Doris Vanden Akker [dvandenakker@RQN.COM]
Sent: 9/28/2018 8:49:17 PM
To: Doris Vanden Akker [dvandenakker@RQN.COM]; 'aaverett@sunrise-eng.com' [aaverett@sunrise-eng.com]; 'Adrienne.Sandoval@andeavor.com' [Adrienne.Sandoval@andeavor.com]; 'amyc@utetribe.com' [amyc@utetribe.com]; 'Angela.Zivkovich@anadarko.com' [Angela.Zivkovich@anadarko.com]; 'ashley@publiclandsolutions.org' [ashley@publiclandsolutions.org]; 'bstringer@uintah.utah.gov' [bstringer@uintah.utah.gov]; 'Rhammer@SLRconsulting.com' [Rhammer@SLRconsulting.com]; 'Chad.Schlichtemeier@anadarko.com' [Chad.Schlichtemeier@anadarko.com]; 'chelsea.cantrelle@epenergy.com' [chelsea.cantrelle@epenergy.com]; Dresser, Chris [Dresser.Chris@epa.gov]; Beeler, Cindy [Beeler.Cindy@epa.gov]; Smith, Claudia [Smith.Claudia@epa.gov]; 'dbrown@tricountyhealth.com' [dbrown@tricountyhealth.com]; 'dmcneill@utah.gov' [dmcneill@utah.gov]; 'debbie@breatheutah.org' [debbie@breatheutah.org]; 'Djordan@newfield.com' [Djordan@newfield.com]; 'Eoman@altamontenergy.com' [Eoman@altamontenergy.com]; 'eehrmantraut@SLRconsulting.com' [eehrmantraut@SLRconsulting.com]; 'evernon@blm.gov' [evernon@blm.gov]; 'gtodd@duchesne.utah.gov' [gtodd@duchesne.utah.gov]; 'huy.tran@usu.edu' [huy.tran@usu.edu]; 'jpatterson@ndnlaw.com' [jpatterson@ndnlaw.com]; 'j.woodland@crescentpointenergy.com' [j.woodland@crescentpointenergy.com]; 'joe.sager@epenergy.com' [joe.sager@epenergy.com]; 'John.Spencer@simplot.com' [John.Spencer@simplot.com]; 'jmathis@tricountyhealth.com' [jmathis@tricountyhealth.com]; 'Jhirschi@enervest.net' [Jhirschi@enervest.net]; 'kburdick@Duchesne.utah.gov' [kburdick@Duchesne.utah.gov]; 'kvantassell@le.utah.gov' [kvantassell@le.utah.gov]; 'Lolsen@altamontenergy.com' [Lolsen@altamontenergy.com]; Lexie Wilson [lexiewilson@utah.gov]; 'lonnief@utetribe.com' [lonnief@utetribe.com]; Marie Durrant [MBDurrant@rqn.com]; 'mariek@utetribe.com' [mariek@utetribe.com]; 'marc.mansfield@usu.edu' [marc.mansfield@usu.edu]; mberger@utah.gov; 'mstewart@redleafinc.com' [mstewart@redleafinc.com]; Garvey, Megan [garvey.megan@epa.gov]; miken@utetribe.com; minnieg@utetribe.com; Morales, Monica [Morales.Monica@epa.gov]; 'rpage@ie-cos.com' [rpage@ie-cos.com]; 'rikki.hrenko@enefitamericanoil.com' [rikki.hrenko@enefitamericanoil.com]; 'Ryan.Clerico@enefit.com' [Ryan.Clerico@enefit.com]; 'scottchew@le.utah.gov' [scottchew@le.utah.gov]; 'seth.lyman@usu.edu' [seth.lyman@usu.edu]; 'svance@utah.gov' [svance@utah.gov]; 'Spencer_Kimball@eogresources.com' [Spencer_Kimball@eogresources.com]; 'ssiffring@westernenergyalliance.org' [ssiffring@westernenergyalliance.org]; 'Thomas.H.Gibbons@andeavor.com' [Thomas.H.Gibbons@andeavor.com]; 'trang.tran@usu.edu' [trang.tran@usu.edu]; 'ttodd@utah.gov' [ttodd@utah.gov]; 'val.oman@epenergy.com' [val.oman@epenergy.com]; 'vince.christensen@simplot.com' [vince.christensen@simplot.com]; 'woswald@utah.gov' [woswald@utah.gov]; Ex. 6 Personal Privacy (PP)

Subject: Canceled: 1. Immediate proactive reductions: Near-term, proactive actions to reduce ozone and respond to ozone events (industry only)
Location: Uinta Basin Ozone Working Group

Start: 10/24/2018 6:00:00 PM
End: 10/24/2018 7:00:00 PM
Show Time As: Free

Importance: High

Recurrence: (none)

Appointment

From: Maggi Young [Maggi.Young@chk.com]
Sent: 12/5/2018 4:48:15 PM
To: Abby Bazin [abby.bazin@nblenergy.com]; Adrian Araiza [aaraiza@cimarex.com]; Angie Burckhalter [angie.burckhalter@dvn.com]; Brian Noonan [brian.noonan@anadarko.com]; Brian Woodard [brian.woodard@chk.com]; bthompson@axpc.us; Carrie Reese [carrie.reese@pxd.com]; Collin Weibel [collin.weibel@chk.com]; Demarco Jones [demarco_jones@xtoenergy.com]; Dennis Newman [dennis_newman@oxy.com]; Doug Kepler [KeplerD@srcx.com]; Dustin Kinder [Dustin_Kinder@eogresources.com]; Greg Schrab [gschrab@sm-energy.com]; Gretchen Kern [Gretchen.Kern@pxd.com]; Henry Hill [henry.hill@pxd.com]; Jagadeesan.Sethuraman@whiting.com; Jemine Oakes [jemine_oakes@eogresources.com]; Jill Cooper - Anadarko Petroleum Corporation (Jill.Cooper@anadarko.com) [Jill.Cooper@anadarko.com]; Joe Araiza [joe.araiza@epenergy.com]; Katrina Hettinger [katrina.hettinger@encana.com]; Ken Nichols [ken.nichols@dvn.com]; Laura Ragozzino [lragozzino@rangeresources.com]; Lee Fuller [lfuller@ipaa.org]; Linda McDonald [lmcdonald@sandridgeenergy.com]; Lucas Smith [lucas.smith@wpxenergy.com]; Garvey, Megan [garvey.megan@epa.gov]; Michael Grenz [michael.grenz@nblenergy.com]; Michael Sherman [msherman@rangeresources.com]; Nick Groves [Nick_Groves@eogresources.com]; Pat Beck [pat_beck@swn.com]; Pete Miller [pmiller@rangeresources.com]; Samatha McDonald [SMcDonald@ipaa.org]; Susan Ginsberg [sginsberg@ipaa.org]; Wendy Gram [wwgram@marathonoil.com]; William Lambert [William.Lambert@Whiting.com]; Becky Haldane Woolf [becky.haldane@nblenergy.com]; Kollath, Leigh Ann [leighann.kollath@jonahenergy.com]; Angela Zivkovich [angela.zivkovich@anadarko.com]
CC: Winn, Lisa [Lisa_Winn@xtoenergy.com]; Rick McCurdy [rick.mccurdy@chk.com]; Wendy Kirchoff [wendy.kirchoff@nblenergy.com]; Dinkel, Mike [Mike.Dinkel@anadarko.com]; Loc Cao [Loc.Cao@dvn.com]; Meredith Schneberger [Meredith.Schneberger@dvn.com]

Subject: Canceled: WISC Monthly Call
Location: Conference Call

Start: 3/6/2017 5:00:00 PM
End: 3/6/2017 6:00:00 PM
Show Time As: Free

Importance: High

Recurrence: (none)

Appointment

From: Marie Bradshaw Durrant [MBDurrant@rqn.com]
Sent: 3/19/2019 10:40:14 PM
To: Marie Bradshaw Durrant [MBDurrant@rqn.com]; 'aaverett@sunrise-eng.com' [aaverett@sunrise-eng.com]; 'Adrienne.Sandoval@andeavor.com' [Adrienne.Sandoval@andeavor.com]; 'amyc@utetribe.com' [amyc@utetribe.com]; 'Angela.Zivkovich@anadarko.com' [Angela.Zivkovich@anadarko.com]; 'ashley@publiclandsolutions.org' [ashley@publiclandsolutions.org]; 'bstringer@uintah.utah.gov' [bstringer@uintah.utah.gov]; 'Rhammer@SLRconsulting.com' [Rhammer@SLRconsulting.com]; 'bmensinger@trinityconsultants.com' [bmensinger@trinityconsultants.com]; 'Chad.Schlichtemeier@anadarko.com' [Chad.Schlichtemeier@anadarko.com]; 'chelsea.cantrelle@epenergy.com' [chelsea.cantrelle@epenergy.com]; 'CColclasure@bwenergylaw.com' [CColclasure@bwenergylaw.com]; Dresser, Chris [Dresser.Chris@epa.gov]; Beeler, Cindy [Beeler.Cindy@epa.gov]; Smith, Claudia [Smith.Claudia@epa.gov]; Bean, Clayton [bean.clayton@epa.gov]; 'corey.jones@epenergy.com' [corey.jones@epenergy.com]; 'Daniel.D.Pring@andeavor.com' [Daniel.D.Pring@andeavor.com]; 'dbrown@tricountyhealth.com' [dbrown@tricountyhealth.com]; 'dmcneill@utah.gov' [dmcneill@utah.gov]; 'debbie@breatheutah.org' [debbie@breatheutah.org]; 'Djordan@newfield.com' [Djordan@newfield.com]; 'Eoman@altamontenergy.com' [Eoman@altamontenergy.com]; 'eehrmantraut@SLRconsulting.com' [eehrmantraut@SLRconsulting.com]; 'evernon@blm.gov' [evernon@blm.gov]; 'gtodd@duchesne.utah.gov' [gtodd@duchesne.utah.gov]; 'huy.tran@usu.edu' [huy.tran@usu.edu]; 'jpatterson@ndnlaw.com' [jpatterson@ndnlaw.com]; 'James.woodall@encana.com' [James.woodall@encana.com]; 'jwoodland@crescentpointenergy.com' [jwoodland@crescentpointenergy.com]; 'Jean.semborski@cop.com' [Jean.semborski@cop.com]; 'joe.sager@epenergy.com' [joe.sager@epenergy.com]; 'John.Spencer@simplot.com' [John.Spencer@simplot.com]; Ex. 6 Personal Privacy (PP); 'jmathis@tricountyhealth.com' [jmathis@tricountyhealth.com]; 'Jhirschi@enervest.net' [Jhirschi@enervest.net]; 'Karen_Pratt@xtoenergy.com' [Karen_Pratt@xtoenergy.com]; 'kburdick@Duchesne.utah.gov' [kburdick@Duchesne.utah.gov]; 'Lolsen@altamontenergy.com' [Lolsen@altamontenergy.com]; Lexie Wilson [lexiewilson@utah.gov]; 'lonnief@utetribe.com' [lonnief@utetribe.com]; 'mariek@utetribe.com' [mariek@utetribe.com]; 'marc.mansfield@usu.edu' [marc.mansfield@usu.edu]; mberger@utah.gov; 'mstewart@redleafinc.com' [mstewart@redleafinc.com]; Garvey, Megan [garvey.megan@epa.gov]; miken@utetribe.com; minnieg@utetribe.com; Morales, Monica [Morales.Monica@epa.gov]; 'rpage@ie-cos.com' [rpage@ie-cos.com]; 'rhrenko-browning@utahpetroleum.org' [rhrenko-browning@utahpetroleum.org]; 'Ryan.Clerico@enefit.com' [Ryan.Clerico@enefit.com]; 'Ryan@kairosaerospace.com' [Ryan@kairosaerospace.com]; 'Ryan.Swanson@epenergy.com' [Ryan.Swanson@epenergy.com]; 'scottchew@le.utah.gov' [scottchew@le.utah.gov]; Jackson, Scott [Jackson.Scott@epa.gov]; 'seth.lyman@usu.edu' [seth.lyman@usu.edu]; 'svance@utah.gov' [svance@utah.gov]; 'Spencer_Kimball@eogresources.com' [Spencer_Kimball@eogresources.com]; 'ssiffring@westernenergyalliance.org' [ssiffring@westernenergyalliance.org]; 'Thomas.H.Gibbons@andeavor.com' [Thomas.H.Gibbons@andeavor.com]; 'trang.tran@usu.edu' [trang.tran@usu.edu]; 'ttodd@utah.gov' [ttodd@utah.gov]; 'val.oman@epenergy.com' [val.oman@epenergy.com]; 'vince.christensen@simplot.com' [vince.christensen@simplot.com]; 'woswald@utah.gov' [woswald@utah.gov]; 'jmcqueen@crescentpointenergy.com' [jmcqueen@crescentpointenergy.com]; 'Andrea.Olsen@Simplot.com' [Andrea.Olsen@Simplot.com]; 'cpennell@utah.gov' [cpennell@utah.gov]; Nancy Daher [ndaher@utah.gov]; 'amatheson@utah.gov' [amatheson@utah.gov]; 'wesadams@utah.gov' [wesadams@utah.gov]; 'twiseman@utah.gov' [twiseman@utah.gov]

Subject: Uinta Basin Ozone Working Group Meeting - In Person If Possible!
Location: 50 E 200 S, Roosevelt, UT 84066

Start: 4/11/2019 8:30:00 PM
End: 4/11/2019 10:30:00 PM
Show Time As: Tentative

Recurrence: (none)

Appointment

From: Marie Bradshaw Durrant [MBDurrant@rqn.com]
Sent: 4/11/2019 3:29:28 PM
To: 'Adrienne.Sandoval@andeavor.com' [Adrienne.Sandoval@andeavor.com]; 'Andrea.Olsen@Simplot.com' [Andrea.Olsen@Simplot.com]; 'Angela.Zivkovich@anadarko.com' [Angela.Zivkovich@anadarko.com]; Beeler, Cindy [Beeler.Cindy@epa.gov]; 'CColclasure@bwenergylaw.com' [CColclasure@bwenergylaw.com]; 'Chad.Schlichtemeier@anadarko.com' [Chad.Schlichtemeier@anadarko.com]; 'Daniel.D.Pring@andeavor.com' [Daniel.D.Pring@andeavor.com]; 'Djordan@newfield.com' [Djordan@newfield.com]; Dresser, Chris [Dresser.Chris@epa.gov]; 'Eoman@altamontenergy.com' [Eoman@altamontenergy.com]; 'James.woodall@encana.com' [James.woodall@encana.com]; 'Jean.semborski@cop.com' [Jean.semborski@cop.com]; 'Jhirschi@enervest.net' [Jhirschi@enervest.net]; 'John.Spencer@simplot.com' [John.Spencer@simplot.com]; 'Karen_Pratt@xtoenergy.com' [Karen_Pratt@xtoenergy.com]; 'Lolsen@altamontenergy.com' [Lolsen@altamontenergy.com]; 'Rhammer@SLRconsulting.com' [Rhammer@SLRconsulting.com]; 'Ryan.Clerico@enefit.com' [Ryan.Clerico@enefit.com]; 'Ryan.Swanson@epenergy.com' [Ryan.Swanson@epenergy.com]; 'Ryan@kairosaerospace.com' [Ryan@kairosaerospace.com]; 'Spencer_Kimball@eogresources.com' [Spencer_Kimball@eogresources.com]; 'Thomas.H.Gibbons@andeavor.com' [Thomas.H.Gibbons@andeavor.com]; 'aaverett@sunrise-eng.com' [aaverett@sunrise-eng.com]; 'amatheson@utah.gov' [amatheson@utah.gov]; 'amyc@utetribe.com' [amyc@utetribe.com]; 'ashley@publiclandsolutions.org' [ashley@publiclandsolutions.org]; Bean, Clayton [bean.clayton@epa.gov]; 'bmensinger@trinityconsultants.com' [bmensinger@trinityconsultants.com]; 'bstringer@uintah.utah.gov' [bstringer@uintah.utah.gov]; 'chelsea.cantrelle@epenergy.com' [chelsea.cantrelle@epenergy.com]; 'corey.jones@epenergy.com' [corey.jones@epenergy.com]; 'cpennell@utah.gov' [cpennell@utah.gov]; 'dbrown@tricountyhealth.com' [dbrown@tricountyhealth.com]; 'debbie@breatheutah.org' [debbie@breatheutah.org]; 'dmcneill@utah.gov' [dmcneill@utah.gov]; 'eehrmantraut@SLRconsulting.com' [eehrmantraut@SLRconsulting.com]; 'evernon@blm.gov' [evernon@blm.gov]; Garvey, Megan [garvey.megan@epa.gov]; 'gtodd@duchesne.utah.gov' [gtodd@duchesne.utah.gov]; 'huy.tran@usu.edu' [huy.tran@usu.edu]; Jackson, Scott [Jackson.Scott@epa.gov]; 'jmathis@tricountyhealth.com' [jmathis@tricountyhealth.com]; 'jmcqueen@crescentpointenergy.com' [jmcqueen@crescentpointenergy.com]; **Ex. 6 Personal Privacy (PP)**; 'joe.sager@epenergy.com' [joe.sager@epenergy.com]; 'jpatterson@ndnlaw.com' [jpatterson@ndnlaw.com]; 'jwoodland@crescentpointenergy.com' [jwoodland@crescentpointenergy.com]; 'kburdick@Duchesne.utah.gov' [kburdick@Duchesne.utah.gov]; Lexie Wilson [lexiewilson@utah.gov]; 'lonnief@utetribe.com' [lonnief@utetribe.com]; 'marc.mansfield@usu.edu' [marc.mansfield@usu.edu]; 'mariek@utetribe.com' [mariek@utetribe.com]; mberger@utah.gov; miken@utetribe.com; minnieg@utetribe.com; Morales, Monica [Morales.Monica@epa.gov]; 'mstewart@redleafinc.com' [mstewart@redleafinc.com]; Nancy Daher [ndaher@utah.gov]; 'rhrenko-browning@utahpetroleum.org' [rhrenko-browning@utahpetroleum.org]; 'rpage@ie-cos.com' [rpage@ie-cos.com]; 'scottchew@le.utah.gov' [scottchew@le.utah.gov]; 'seth.lyman@usu.edu' [seth.lyman@usu.edu]; Smith, Claudia [Smith.Claudia@epa.gov]; 'ssiffring@westernenergyalliance.org' [ssiffring@westernenergyalliance.org]; 'svance@utah.gov' [svance@utah.gov]; 'trang.tran@usu.edu' [trang.tran@usu.edu]; 'ttodd@utah.gov' [ttodd@utah.gov]; 'twiseman@utah.gov' [twiseman@utah.gov]; 'val.oman@epenergy.com' [val.oman@epenergy.com]; 'vince.christensen@simplot.com' [vince.christensen@simplot.com]; 'wesadams@utah.gov' [wesadams@utah.gov]; 'woswald@utah.gov' [woswald@utah.gov]
CC: 'Douglas.Jordan@encana.com' [Douglas.Jordan@encana.com]; Singh, Amrita [singh.amrita@epa.gov]; Tonnesen, Gail [Tonnesen.Gail@epa.gov]; 'irene@uintabasin.org' [irene@uintabasin.org]; Yamartino, Jillian [Jillian.Yamartino@anadarko.com]

Subject: Uinta Basin Ozone Working Group Meeting - agenda and video/call-in information
Location: Crossroads Community Center 50 E 200 S, Roosevelt, UT 84066

Start: 4/11/2019 8:30:00 PM
End: 4/11/2019 10:30:00 PM
Show Time As: Tentative

Recurrence: (none)

Appointment

From: Marie Bradshaw Durrant [MBDurrant@rqn.com]
Sent: 1/4/2019 7:24:14 PM
To: 'dbrown@tricountyhealth.com' [dbrown@tricountyhealth.com]; 'vince.christensen@simplot.com' [vince.christensen@simplot.com]; 'kvantassell@le.utah.gov' [kvantassell@le.utah.gov]; Bean, Clayton [bean.clayton@epa.gov]; 'ashley@publiclandsolutions.org' [ashley@publiclandsolutions.org]; minnieg@utetribe.com; 'Lolsen@altamontenergy.com' [Lolsen@altamontenergy.com]; 'debbie@breatheutah.org' [debbie@breatheutah.org]; 'Chad.Schlichtemeier@anadarko.com' [Chad.Schlichtemeier@anadarko.com]; Smith, Claudia [Smith.Claudia@epa.gov]; 'rikki.hrenko-browning@enefit.com' [rikki.hrenko-browning@enefit.com]; Morales, Monica [Morales.Monica@epa.gov]; 'Jean.semborski@cop.com' [Jean.semborski@cop.com]; 'jmcqueen@crescentpointenergy.com' [jmcqueen@crescentpointenergy.com]; 'Thomas.H.Gibbons@andeavor.com' [Thomas.H.Gibbons@andeavor.com]; 'Ryan.Swanson@epenergy.com' [Ryan.Swanson@epenergy.com]; 'lonnief@utetribe.com' [lonnief@utetribe.com]; Ex. 6 Personal Privacy (PP) 'trang.tran@usu.edu' [trang.tran@usu.edu]; 'Rhammer@SLRconsulting.com' [Rhammer@SLRconsulting.com]; 'jmathis@tricountyhealth.com' [jmathis@tricountyhealth.com]; 'ssiffring@westernenergyalliance.org' [ssiffring@westernenergyalliance.org]; 'huy.tran@usu.edu' [huy.tran@usu.edu]; 'Ryan@kairosaerospace.com' [Ryan@kairosaerospace.com]; 'evernon@blm.gov' [evernon@blm.gov]; 'scottchew@le.utah.gov' [scottchew@le.utah.gov]; 'jwoodland@crescentpointenergy.com' [jwoodland@crescentpointenergy.com]; 'kburdick@Duchesne.utah.gov' [kburdick@Duchesne.utah.gov]; 'amyc@utetribe.com' [amyc@utetribe.com]; 'corey.jones@epenergy.com' [corey.jones@epenergy.com]; 'chelsea.cantrelle@epenergy.com' [chelsea.cantrelle@epenergy.com]; 'Ryan.Clerico@enefit.com' [Ryan.Clerico@enefit.com]; 'svance@utah.gov' [svance@utah.gov]; 'Jhirschi@enervest.net' [Jhirschi@enervest.net]; 'bstringer@uintah.utah.gov' [bstringer@uintah.utah.gov]; Dresser, Chris [Dresser.Chris@epa.gov]; miken@utetribe.com; 'eehrmantraut@SLRconsulting.com' [eehrmantraut@SLRconsulting.com]; 'bmensinger@trinityconsultants.com' [bmensinger@trinityconsultants.com]; 'mstewart@redleafinc.com' [mstewart@redleafinc.com]; mberger@utah.gov; 'Adrienne.Sandoval@andeavor.com' [Adrienne.Sandoval@andeavor.com]; 'rpage@ie-cos.com' [rpage@ie-cos.com]; 'gtodd@duchesne.utah.gov' [gtodd@duchesne.utah.gov]; 'seth.lyman@usu.edu' [seth.lyman@usu.edu]; 'mariek@utetribe.com' [mariek@utetribe.com]; 'CColclasure@bwenergylaw.com' [CColclasure@bwenergylaw.com]; Beeler, Cindy [Beeler.Cindy@epa.gov]; Garvey, Megan [garvey.megan@epa.gov]; 'Angela.Zivkovich@anadarko.com' [Angela.Zivkovich@anadarko.com]; 'Karen_Pratt@xtoenergy.com' [Karen_Pratt@xtoenergy.com]; 'Djordan@newfield.com' [Djordan@newfield.com]; 'Jwoodall@newfield.com' [Jwoodall@newfield.com]; 'woswald@utah.gov' [woswald@utah.gov]; 'aaverett@sunrise-eng.com' [aaverett@sunrise-eng.com]; Jackson, Scott [Jackson.Scott@epa.gov]; 'dmcneill@utah.gov' [dmcneill@utah.gov]; Lexie Wilson [lexiewilson@utah.gov]; 'joe.sager@epenergy.com' [joe.sager@epenergy.com]; 'Eoman@altamontenergy.com' [Eoman@altamontenergy.com]; 'Daniel.D.Pring@andeavor.com' [Daniel.D.Pring@andeavor.com]; 'ttodd@utah.gov' [ttodd@utah.gov]; 'Spencer_Kimball@eogresources.com' [Spencer_Kimball@eogresources.com]; 'val.oman@epenergy.com' [val.oman@epenergy.com]; 'John.Spencer@simplot.com' [John.Spencer@simplot.com]; 'marc.mansfield@usu.edu' [marc.mansfield@usu.edu]; 'jpatterson@ndnlaw.com' [jpatterson@ndnlaw.com]
CC: 'Semborski, Jean' [Jean.Semborski@conocophillips.com]; 'nhall@utah.gov' [nhall@utah.gov]; 'Olsen, Andrea' [andrea.olsen@Simplot.com Ex. 6 Personal Privacy (PP)

Subject: Uinta Basin Working Group Meeting
Location: Vernal, Salt Lake City, Denver

Start: 1/8/2019 9:00:00 PM
End: 1/8/2019 10:00:00 PM
Show Time As: Tentative

Recurrence: (none)

Appointment

From: Marie Bradshaw Durrant [MBDurrant@rqn.com]
Sent: 4/5/2019 6:53:57 PM
To: 'Adrienne.Sandoval@andeavor.com' [Adrienne.Sandoval@andeavor.com]; 'Andrea.Olsen@Simplot.com' [Andrea.Olsen@Simplot.com]; 'Angela.Zivkovich@anadarko.com' [Angela.Zivkovich@anadarko.com]; Beeler, Cindy [Beeler.Cindy@epa.gov]; 'CColclasure@bwenergylaw.com' [CColclasure@bwenergylaw.com]; 'Chad.Schlichtemeier@anadarko.com' [Chad.Schlichtemeier@anadarko.com]; 'Daniel.D.Pring@andeavor.com' [Daniel.D.Pring@andeavor.com]; 'Djordan@newfield.com' [Djordan@newfield.com]; Dresser, Chris [Dresser.Chris@epa.gov]; 'Eoman@altamontenergy.com' [Eoman@altamontenergy.com]; 'James.woodall@encana.com' [James.woodall@encana.com]; 'Jean.semborski@cop.com' [Jean.semborski@cop.com]; 'Jhirschi@enervest.net' [Jhirschi@enervest.net]; 'John.Spencer@simplot.com' [John.Spencer@simplot.com]; 'Karen_Pratt@xtoenergy.com' [Karen_Pratt@xtoenergy.com]; 'Lolsen@altamontenergy.com' [Lolsen@altamontenergy.com]; 'Rhammer@SLRconsulting.com' [Rhammer@SLRconsulting.com]; 'Ryan.Clerico@enefit.com' [Ryan.Clerico@enefit.com]; 'Ryan.Swanson@epenergy.com' [Ryan.Swanson@epenergy.com]; 'Ryan@kairosaerospace.com' [Ryan@kairosaerospace.com]; 'Spencer_Kimball@eogresources.com' [Spencer_Kimball@eogresources.com]; 'Thomas.H.Gibbons@andeavor.com' [Thomas.H.Gibbons@andeavor.com]; 'aaverett@sunrise-eng.com' [aaverett@sunrise-eng.com]; 'amatheson@utah.gov' [amatheson@utah.gov]; 'amyc@utetribe.com' [amyc@utetribe.com]; 'ashley@publiclandsolutions.org' [ashley@publiclandsolutions.org]; Bean, Clayton [bean.clayton@epa.gov]; 'bmensinger@trinityconsultants.com' [bmensinger@trinityconsultants.com]; 'bstringer@uintah.utah.gov' [bstringer@uintah.utah.gov]; 'chelsea.cantrelle@epenergy.com' [chelsea.cantrelle@epenergy.com]; 'corey.jones@epenergy.com' [corey.jones@epenergy.com]; 'cpennell@utah.gov' [cpennell@utah.gov]; 'dbrown@tricountyhealth.com' [dbrown@tricountyhealth.com]; 'debbie@breatheutah.org' [debbie@breatheutah.org]; 'dmcneill@utah.gov' [dmcneill@utah.gov]; 'eehrmantraut@SLRconsulting.com' [eehrmantraut@SLRconsulting.com]; 'evernon@blm.gov' [evernon@blm.gov]; Garvey, Megan [garvey.megan@epa.gov]; 'gtodd@duchesne.utah.gov' [gtodd@duchesne.utah.gov]; 'huy.tran@usu.edu' [huy.tran@usu.edu]; Jackson, Scott [Jackson.Scott@epa.gov]; 'jmathis@tricountyhealth.com' [jmathis@tricountyhealth.com]; 'jmcqueen@crescentpointenergy.com' [jmcqueen@crescentpointenergy.com]; **Ex. 6 Personal Privacy (PP)**; 'joe.sager@epenergy.com' [joe.sager@epenergy.com]; 'jpatterson@ndnlaw.com' [jpatterson@ndnlaw.com]; 'jwoodland@crescentpointenergy.com' [jwoodland@crescentpointenergy.com]; 'kburdick@Duchesne.utah.gov' [kburdick@Duchesne.utah.gov]; Lexie Wilson [lexiewilson@utah.gov]; 'lonnief@utetribe.com' [lonnief@utetribe.com]; 'marc.mansfield@usu.edu' [marc.mansfield@usu.edu]; 'mariek@utetribe.com' [mariek@utetribe.com]; mberger@utah.gov; miken@utetribe.com; minnieg@utetribe.com; Morales, Monica [Morales.Monica@epa.gov]; 'mstewart@redleafinc.com' [mstewart@redleafinc.com]; Nancy Daher [ndaher@utah.gov]; 'rhrenko-browning@utahpetroleum.org' [rhrenko-browning@utahpetroleum.org]; 'rpage@ie-cos.com' [rpage@ie-cos.com]; 'scottchew@le.utah.gov' [scottchew@le.utah.gov]; 'seth.lyman@usu.edu' [seth.lyman@usu.edu]; Smith, Claudia [Smith.Claudia@epa.gov]; 'ssiffring@westernenergyalliance.org' [ssiffring@westernenergyalliance.org]; 'svance@utah.gov' [svance@utah.gov]; 'trang.tran@usu.edu' [trang.tran@usu.edu]; 'ttodd@utah.gov' [ttodd@utah.gov]; 'twiseman@utah.gov' [twiseman@utah.gov]; 'val.oman@epenergy.com' [val.oman@epenergy.com]; 'vince.christensen@simplot.com' [vince.christensen@simplot.com]; 'wesadams@utah.gov' [wesadams@utah.gov]; 'woswald@utah.gov' [woswald@utah.gov]
CC: 'Douglas.Jordan@encana.com' [Douglas.Jordan@encana.com]; Tonnesen, Gail [Tonnesen.Gail@epa.gov]

Subject: Uinta Basin Ozone Working Group Meeting - In Person If Possible!
Location: 50 E 200 S, Roosevelt, UT 84066

Start: 4/11/2019 8:30:00 PM
End: 4/11/2019 10:30:00 PM
Show Time As: Tentative

Recurrence: (none)

Appointment

From: Marie Durrant [MBDurrant@rqn.com]
Sent: 11/27/2018 11:40:58 PM
To: 'aaverett@sunrise-eng.com' [aaverett@sunrise-eng.com]; 'Adrienne.Sandoval@andeavor.com' [Adrienne.Sandoval@andeavor.com]; 'amyc@utetribe.com' [amyc@utetribe.com]; 'Angela.Zivkovich@anadarko.com' [Angela.Zivkovich@anadarko.com]; 'ashley@publiclandsolutions.org' [ashley@publiclandsolutions.org]; 'bstringer@uintah.utah.gov' [bstringer@uintah.utah.gov]; 'Rhammer@SLRconsulting.com' [Rhammer@SLRconsulting.com]; 'bmensinger@trinityconsultants.com' [bmensinger@trinityconsultants.com]; 'Chad.Schlichtemeier@anadarko.com' [Chad.Schlichtemeier@anadarko.com]; 'chelsea.cantrelle@epenergy.com' [chelsea.cantrelle@epenergy.com]; 'CColclasure@bwenergylaw.com' [CColclasure@bwenergylaw.com]; Dresser, Chris [Dresser.Chris@epa.gov]; Beeler, Cindy [Beeler.Cindy@epa.gov]; Smith, Claudia [Smith.Claudia@epa.gov]; Bean, Clayton [bean.clayton@epa.gov]; 'corey.jones@epenergy.com' [corey.jones@epenergy.com]; 'Daniel.D.Pring@andeavor.com' [Daniel.D.Pring@andeavor.com]; 'dbrown@tricountyhealth.com' [dbrown@tricountyhealth.com]; 'dmcneill@utah.gov' [dmcneill@utah.gov]; 'debbie@breatheutah.org' [debbie@breatheutah.org]; 'Djordan@newfield.com' [Djordan@newfield.com]; 'Eoman@altamontenergy.com' [Eoman@altamontenergy.com]; 'eehrmantraut@SLRconsulting.com' [eehrmantraut@SLRconsulting.com]; 'evernon@blm.gov' [evernon@blm.gov]; 'gtodd@duchesne.utah.gov' [gtodd@duchesne.utah.gov]; 'huy.tran@usu.edu' [huy.tran@usu.edu]; 'jpatterson@ndnlaw.com' [jpatterson@ndnlaw.com]; 'Jwoodall@newfield.com' [Jwoodall@newfield.com]; 'jwoodland@crescentpointenergy.com' [jwoodland@crescentpointenergy.com]; 'Jean.semborski@cop.com' [Jean.semborski@cop.com]; 'joe.sager@epenergy.com' [joe.sager@epenergy.com]; 'John.Spencer@simplot.com' [John.Spencer@simplot.com]; Ex. 6 Personal Privacy (PP); 'jmathis@tricountyhealth.com' [jmathis@tricountyhealth.com]; 'Jhirschi@enervest.net' [Jhirschi@enervest.net]; 'Karen_Pratt@xtoenergy.com' [Karen_Pratt@xtoenergy.com]; 'kburdick@Duchesne.utah.gov' [kburdick@Duchesne.utah.gov]; 'kvantassell@le.utah.gov' [kvantassell@le.utah.gov]; 'Lolsen@altamontenergy.com' [Lolsen@altamontenergy.com]; Lexie Wilson [lexiewilson@utah.gov]; 'lonnief@utetribe.com' [lonnief@utetribe.com]; 'mariek@utetribe.com' [mariek@utetribe.com]; 'marc.mansfield@usu.edu' [marc.mansfield@usu.edu]; mberger@utah.gov; 'mstewart@redleafinc.com' [mstewart@redleafinc.com]; Garvey, Megan [garvey.megan@epa.gov]; miken@utetribe.com; minnieg@utetribe.com; Morales, Monica [Morales.Monica@epa.gov]; 'rpage@ie-cos.com' [rpage@ie-cos.com]; 'rikki.hrenko-browning@enefit.com' [rikki.hrenko-browning@enefit.com]; 'Ryan.Clerico@enefit.com' [Ryan.Clerico@enefit.com]; 'Ryan@kairosaerospace.com' [Ryan@kairosaerospace.com]; 'Ryan.Swanson@epenergy.com' [Ryan.Swanson@epenergy.com]; 'scottchew@le.utah.gov' [scottchew@le.utah.gov]; Jackson, Scott [Jackson.Scott@epa.gov]; 'seth.lyman@usu.edu' [seth.lyman@usu.edu]; 'svance@utah.gov' [svance@utah.gov]; 'Spencer_Kimball@eogresources.com' [Spencer_Kimball@eogresources.com]; 'ssiffring@westernenergyalliance.org' [ssiffring@westernenergyalliance.org]; 'Thomas.H.Gibbons@andeavor.com' [Thomas.H.Gibbons@andeavor.com]; 'trang.tran@usu.edu' [trang.tran@usu.edu]; 'ttodd@utah.gov' [ttodd@utah.gov]; 'val.oman@epenergy.com' [val.oman@epenergy.com]; 'vince.christensen@simplot.com' [vince.christensen@simplot.com]; 'woswald@utah.gov' [woswald@utah.gov]; 'jmcqueen@crescentpointenergy.com' [jmcqueen@crescentpointenergy.com]

Subject: Uinta Basin Working Group Meeting
Location: Vernal, Salt Lake City, Denver

Start: 1/8/2019 9:00:00 PM
End: 1/8/2019 11:00:00 PM
Show Time As: Tentative

Recurrence: (none)

Appointment

From: Marie Durrant [MBDurrant@rqn.com]
Sent: 11/21/2018 11:16:44 PM
To: Marie Durrant [MBDurrant@rqn.com]; 'aaverett@sunrise-eng.com' [aaverett@sunrise-eng.com]; 'Adrienne.Sandoval@andeavor.com' [Adrienne.Sandoval@andeavor.com]; 'amyc@utetribe.com' [amyc@utetribe.com]; 'Angela.Zivkovich@anadarko.com' [Angela.Zivkovich@anadarko.com]; 'ashley@publiclandsolutions.org' [ashley@publiclandsolutions.org]; 'bstringer@uintah.utah.gov' [bstringer@uintah.utah.gov]; 'Rhammer@SLRconsulting.com' [Rhammer@SLRconsulting.com]; 'bmensinger@trinityconsultants.com' [bmensinger@trinityconsultants.com]; 'Chad.Schlichtemeier@anadarko.com' [Chad.Schlichtemeier@anadarko.com]; 'chelsea.cantrelle@epenergy.com' [chelsea.cantrelle@epenergy.com]; 'CColclasure@bwenergylaw.com' [CColclasure@bwenergylaw.com]; Dresser, Chris [Dresser.Chris@epa.gov]; Beeler, Cindy [Beeler.Cindy@epa.gov]; Smith, Claudia [Smith.Claudia@epa.gov]; Bean, Clayton [bean.clayton@epa.gov]; 'corey.jones@epenergy.com' [corey.jones@epenergy.com]; 'Daniel.D.Pring@andeavor.com' [Daniel.D.Pring@andeavor.com]; 'dbrown@tricountyhealth.com' [dbrown@tricountyhealth.com]; 'dmcneill@utah.gov' [dmcneill@utah.gov]; 'debbie@breatheutah.org' [debbie@breatheutah.org]; 'Djordan@newfield.com' [Djordan@newfield.com]; 'Eoman@altamontenergy.com' [Eoman@altamontenergy.com]; 'eehrmantraut@SLRconsulting.com' [eehrmantraut@SLRconsulting.com]; 'evernon@blm.gov' [evernon@blm.gov]; 'gtodd@duchesne.utah.gov' [gtodd@duchesne.utah.gov]; 'huy.tran@usu.edu' [huy.tran@usu.edu]; 'jpatterson@ndnlaw.com' [jpatterson@ndnlaw.com]; 'Jwoodall@newfield.com' [Jwoodall@newfield.com]; 'jwoodland@crescentpointenergy.com' [jwoodland@crescentpointenergy.com]; 'Jean.semborski@cop.com' [Jean.semborski@cop.com]; 'joe.sager@epenergy.com' [joe.sager@epenergy.com]; 'John.Spencer@simplot.com' [John.Spencer@simplot.com] Ex. 6 Personal Privacy (PP) ; 'jmathis@tricountyhealth.com' [jmathis@tricountyhealth.com]; 'Jhirschi@enervest.net' [Jhirschi@enervest.net]; 'Karen_Pratt@xtoenergy.com' [Karen_Pratt@xtoenergy.com]; 'kburdick@Duchesne.utah.gov' [kburdick@Duchesne.utah.gov]; 'kvantassell@le.utah.gov' [kvantassell@le.utah.gov]; 'Lolsen@altamontenergy.com' [Lolsen@altamontenergy.com]; Lexie Wilson [lexiewilson@utah.gov]; 'lonnief@utetribe.com' [lonnief@utetribe.com]; 'mariek@utetribe.com' [mariek@utetribe.com]; 'marc.mansfield@usu.edu' [marc.mansfield@usu.edu]; mberger@utah.gov; 'mstewart@redleafinc.com' [mstewart@redleafinc.com]; Garvey, Megan [garvey.megan@epa.gov]; miken@utetribe.com; minnieg@utetribe.com; Morales, Monica [Morales.Monica@epa.gov]; 'rpage@ie-cos.com' [rpage@ie-cos.com]; 'rikki.hrenko-browning@enefit.com' [rikki.hrenko-browning@enefit.com]; 'Ryan.Clerico@enefit.com' [Ryan.Clerico@enefit.com]; 'Ryan@kairosaerospace.com' [Ryan@kairosaerospace.com]; 'Ryan.Swanson@epenergy.com' [Ryan.Swanson@epenergy.com]; 'scottchew@le.utah.gov' [scottchew@le.utah.gov]; Jackson, Scott [Jackson.Scott@epa.gov]; 'seth.lyman@usu.edu' [seth.lyman@usu.edu]; 'svance@utah.gov' [svance@utah.gov]; 'Spencer_Kimball@eogresources.com' [Spencer_Kimball@eogresources.com]; 'ssiffring@westernenergyalliance.org' [ssiffring@westernenergyalliance.org]; 'Thomas.H.Gibbons@andeavor.com' [Thomas.H.Gibbons@andeavor.com]; 'trang.tran@usu.edu' [trang.tran@usu.edu]; 'ttodd@utah.gov' [ttodd@utah.gov]; 'val.oman@epenergy.com' [val.oman@epenergy.com]; 'vince.christensen@simplot.com' [vince.christensen@simplot.com]; 'woswald@utah.gov' [woswald@utah.gov]; 'jmcqueen@crescentpointenergy.com' [jmcqueen@crescentpointenergy.com]; Doris Vanden Akker [dvandenakker@RQN.COM]

Subject: Uinta Basin Ozone Working Group
Location: Vernal, Salt Lake City, Denver

Start: 11/27/2018 9:00:00 PM
End: 11/27/2018 11:00:00 PM
Show Time As: Tentative

Recurrence: (none)

Appointment

From: Marie Durrant [MBDurrant@rqn.com]
Sent: 11/21/2018 11:16:02 PM
To: 'aaverett@sunrise-eng.com' [aaverett@sunrise-eng.com]; 'Adrienne.Sandoval@andeavor.com' [Adrienne.Sandoval@andeavor.com]; 'amyc@utetribe.com' [amyc@utetribe.com]; 'Angela.Zivkovich@anadarko.com' [Angela.Zivkovich@anadarko.com]; 'ashley@publiclandsolutions.org' [ashley@publiclandsolutions.org]; 'bstringer@uintah.utah.gov' [bstringer@uintah.utah.gov]; 'Rhammer@SLRconsulting.com' [Rhammer@SLRconsulting.com]; 'bmensinger@trinityconsultants.com' [bmensinger@trinityconsultants.com]; 'Chad.Schlichtemeier@anadarko.com' [Chad.Schlichtemeier@anadarko.com]; 'chelsea.cantrelle@epenergy.com' [chelsea.cantrelle@epenergy.com]; 'CColclasure@bwenergylaw.com' [CColclasure@bwenergylaw.com]; Dresser, Chris [Dresser.Chris@epa.gov]; Beeler, Cindy [Beeler.Cindy@epa.gov]; Smith, Claudia [Smith.Claudia@epa.gov]; Bean, Clayton [bean.clayton@epa.gov]; 'corey.jones@epenergy.com' [corey.jones@epenergy.com]; 'Daniel.D.Pring@andeavor.com' [Daniel.D.Pring@andeavor.com]; 'dbrown@tricountyhealth.com' [dbrown@tricountyhealth.com]; 'dmcneill@utah.gov' [dmcneill@utah.gov]; 'debbie@breatheutah.org' [debbie@breatheutah.org]; 'Djordan@newfield.com' [Djordan@newfield.com]; 'Eoman@altamontenergy.com' [Eoman@altamontenergy.com]; 'eehrmantraut@SLRconsulting.com' [eehrmantraut@SLRconsulting.com]; 'evernon@blm.gov' [evernon@blm.gov]; 'gtodd@duchesne.utah.gov' [gtodd@duchesne.utah.gov]; 'huy.tran@usu.edu' [huy.tran@usu.edu]; 'jpatterson@ndnlaw.com' [jpatterson@ndnlaw.com]; 'Jwoodall@newfield.com' [Jwoodall@newfield.com]; 'jwoodland@crescentpointenergy.com' [jwoodland@crescentpointenergy.com]; 'Jean.semborski@cop.com' [Jean.semborski@cop.com]; 'joe.sager@epenergy.com' [joe.sager@epenergy.com]; 'John.Spencer@simplot.com' [John.Spencer@simplot.com]; **Ex. 6 Personal Privacy (PP)**; 'jmathis@tricountyhealth.com' [jmathis@tricountyhealth.com]; 'Jhirschi@enervest.net' [Jhirschi@enervest.net]; 'Karen_Pratt@xtoenergy.com' [Karen_Pratt@xtoenergy.com]; 'kburdick@Duchesne.utah.gov' [kburdick@Duchesne.utah.gov]; 'kvantassell@le.utah.gov' [kvantassell@le.utah.gov]; 'Lolsen@altamontenergy.com' [Lolsen@altamontenergy.com]; Lexie Wilson [lexiewilson@utah.gov]; 'lonnief@utetribe.com' [lonnief@utetribe.com]; 'mariek@utetribe.com' [mariek@utetribe.com]; 'marc.mansfield@usu.edu' [marc.mansfield@usu.edu]; mberger@utah.gov; 'mstewart@redleafinc.com' [mstewart@redleafinc.com]; Garvey, Megan [garvey.megan@epa.gov]; miken@utetribe.com; minnieg@utetribe.com; Morales, Monica [Morales.Monica@epa.gov]; 'rpage@ie-cos.com' [rpage@ie-cos.com]; 'rikki.hrenko-browning@enefit.com' [rikki.hrenko-browning@enefit.com]; 'Ryan.Clerico@enefit.com' [Ryan.Clerico@enefit.com]; 'Ryan@kairosaerospace.com' [Ryan@kairosaerospace.com]; 'Ryan.Swanson@epenergy.com' [Ryan.Swanson@epenergy.com]; 'scottchew@le.utah.gov' [scottchew@le.utah.gov]; Jackson, Scott [Jackson.Scott@epa.gov]; 'seth.lyman@usu.edu' [seth.lyman@usu.edu]; 'svance@utah.gov' [svance@utah.gov]; 'Spencer_Kimball@eogresources.com' [Spencer_Kimball@eogresources.com]; 'ssiffring@westernenergyalliance.org' [ssiffring@westernenergyalliance.org]; 'Thomas.H.Gibbons@andeavor.com' [Thomas.H.Gibbons@andeavor.com]; 'trang.tran@usu.edu' [trang.tran@usu.edu]; 'ttodd@utah.gov' [ttodd@utah.gov]; 'val.oman@epenergy.com' [val.oman@epenergy.com]; 'vince.christensen@simplot.com' [vince.christensen@simplot.com]; 'woswald@utah.gov' [woswald@utah.gov]; 'jmcqueen@crescentpointenergy.com' [jmcqueen@crescentpointenergy.com]; Doris Vanden Akker [dvandenakker@RQN.COM]

Subject: Uinta Basin Ozone Working Group
Location: Vernal, Salt Lake City, Denver

Start: 11/27/2018 9:00:00 PM
End: 11/27/2018 11:00:00 PM
Show Time As: Tentative

Recurrence: (none)

Appointment

From: Marie Bradshaw Durrant [MBDurrant@rqn.com]
Sent: 1/9/2019 4:20:40 PM
To: Marie Bradshaw Durrant [MBDurrant@rqn.com]; 'aaverett@sunrise-eng.com' [aaverett@sunrise-eng.com]; 'Adrienne.Sandoval@andeavor.com' [Adrienne.Sandoval@andeavor.com]; 'amyc@utetribe.com' [amyc@utetribe.com]; 'Angela.Zivkovich@anadarko.com' [Angela.Zivkovich@anadarko.com]; 'ashley@publiclandsolutions.org' [ashley@publiclandsolutions.org]; 'bstringer@uintah.utah.gov' [bstringer@uintah.utah.gov]; 'Rhammer@SLRconsulting.com' [Rhammer@SLRconsulting.com]; 'bmensinger@trinityconsultants.com' [bmensinger@trinityconsultants.com]; 'Chad.Schlichtemeier@anadarko.com' [Chad.Schlichtemeier@anadarko.com]; 'chelsea.cantrelle@epenergy.com' [chelsea.cantrelle@epenergy.com]; 'CColclasure@bwenergylaw.com' [CColclasure@bwenergylaw.com]; Dresser, Chris [Dresser.Chris@epa.gov]; Beeler, Cindy [Beeler.Cindy@epa.gov]; Smith, Claudia [Smith.Claudia@epa.gov]; Bean, Clayton [bean.clayton@epa.gov]; 'corey.jones@epenergy.com' [corey.jones@epenergy.com]; 'Daniel.D.Pring@andeavor.com' [Daniel.D.Pring@andeavor.com]; 'dbrown@tricountyhealth.com' [dbrown@tricountyhealth.com]; 'dmcneill@utah.gov' [dmcneill@utah.gov]; 'debbie@breatheutah.org' [debbie@breatheutah.org]; 'Djordan@newfield.com' [Djordan@newfield.com]; 'Eoman@altamontenergy.com' [Eoman@altamontenergy.com]; 'eehrmantraut@SLRconsulting.com' [eehrmantraut@SLRconsulting.com]; 'evernon@blm.gov' [evernon@blm.gov]; 'gtodd@duchesne.utah.gov' [gtodd@duchesne.utah.gov]; 'huy.tran@usu.edu' [huy.tran@usu.edu]; 'jpatterson@ndnlaw.com' [jpatterson@ndnlaw.com]; 'Jwoodall@newfield.com' [Jwoodall@newfield.com]; 'jwoodland@crescentpointenergy.com' [jwoodland@crescentpointenergy.com]; 'Jean.semborski@cop.com' [Jean.semborski@cop.com]; 'joe.sager@epenergy.com' [joe.sager@epenergy.com]; 'John.Spencer@simplot.com' [John.Spencer@simplot.com]; Ex. 6 Personal Privacy (PP) ; 'jmathis@tricountyhealth.com' [jmathis@tricountyhealth.com]; 'Jhirschi@enervest.net' [Jhirschi@enervest.net]; 'Karen_Pratt@xtoenergy.com' [Karen_Pratt@xtoenergy.com]; 'kburdick@Duchesne.utah.gov' [kburdick@Duchesne.utah.gov]; 'kvantassell@le.utah.gov' [kvantassell@le.utah.gov]; 'Lolsen@altamontenergy.com' [Lolsen@altamontenergy.com]; Lexie Wilson [lexiewilson@utah.gov]; 'lonnief@utetribe.com' [lonnief@utetribe.com]; 'mariek@utetribe.com' [mariek@utetribe.com]; 'marc.mansfield@usu.edu' [marc.mansfield@usu.edu]; mberger@utah.gov; 'mstewart@redleafinc.com' [mstewart@redleafinc.com]; Garvey, Megan [garvey.megan@epa.gov]; miken@utetribe.com; minnieg@utetribe.com; Morales, Monica [Morales.Monica@epa.gov]; 'rpage@ie-cos.com' [rpage@ie-cos.com]; 'rhrenko-browning@utahpetroleum.org' [rhrenko-browning@utahpetroleum.org]; 'Ryan.Clerico@enefit.com' [Ryan.Clerico@enefit.com]; 'Ryan@kairosaerospace.com' [Ryan@kairosaerospace.com]; 'Ryan.Swanson@epenergy.com' [Ryan.Swanson@epenergy.com]; 'scottchew@le.utah.gov' [scottchew@le.utah.gov]; Jackson, Scott [Jackson.Scott@epa.gov]; 'seth.lyman@usu.edu' [seth.lyman@usu.edu]; 'svance@utah.gov' [svance@utah.gov]; 'Spencer_Kimball@eogresources.com' [Spencer_Kimball@eogresources.com]; 'ssiffring@westernenergyalliance.org' [ssiffring@westernenergyalliance.org]; 'Thomas.H.Gibbons@andeavor.com' [Thomas.H.Gibbons@andeavor.com]; 'trang.tran@usu.edu' [trang.tran@usu.edu]; 'ttodd@utah.gov' [ttodd@utah.gov]; 'val.oman@epenergy.com' [val.oman@epenergy.com]; 'vince.christensen@simplot.com' [vince.christensen@simplot.com]; 'woswald@utah.gov' [woswald@utah.gov]; 'jmcqueen@crescentpointenergy.com' [jmcqueen@crescentpointenergy.com]; 'Andrea.Olsen@Simplot.com' [Andrea.Olsen@Simplot.com]; 'cpennell@utah.gov' [cpennell@utah.gov]; Nancy Daher [ndaher@utah.gov]; Doris Vanden Akker [dvandenakker@RQN.COM]; Gabriel Niculescu [niculescu@RQN.COM]

Subject: Uinta Basin Ozone Working Group Meeting
Location: Vernal, Salt Lake City, Denver

Start: 2/12/2019 9:00:00 PM
End: 2/12/2019 10:00:00 PM
Show Time As: Tentative

Recurrence: (none)

Appointment

From: Marie Bradshaw Durrant [MBDurrant@rqn.com]
Sent: 4/8/2019 7:28:32 PM
To: 'svance@utah.gov' [svance@utah.gov]; 'corey.jones@epenergy.com' [corey.jones@epenergy.com]; 'Rhammer@SLRconsulting.com' [Rhammer@SLRconsulting.com]; Nancy Daher [ndaher@utah.gov]; 'huy.tran@usu.edu' [huy.tran@usu.edu]; 'twiseman@utah.gov' [twiseman@utah.gov]; 'James.woodall@encana.com' [James.woodall@encana.com]; 'vince.christensen@simplot.com' [vince.christensen@simplot.com]; 'ttodd@utah.gov' [ttodd@utah.gov]; Beeler, Cindy [Beeler.Cindy@epa.gov]; 'gtodd@duchesne.utah.gov' [gtodd@duchesne.utah.gov]; 'amyc@utetribe.com' [amyc@utetribe.com]; 'Ryan.Swanson@epenergy.com' [Ryan.Swanson@epenergy.com]; 'debbie@breatheutah.org' [debbie@breatheutah.org]; miken@utetribe.com; 'CColclasure@bwenergylaw.com' [CColclasure@bwenergylaw.com]; 'rhrenko-browning@utahpetroleum.org' [rhrenko-browning@utahpetroleum.org]; Bean, Clayton [bean.clayton@epa.gov]; mberger@utah.gov; 'aaverett@sunrise-eng.com' [aaverett@sunrise-eng.com]; 'Ryan@kairosaerospace.com' [Ryan@kairosaerospace.com]; 'lonnief@utetribe.com' [lonnief@utetribe.com]; Ex. 6 Personal Privacy (PP); 'Djordan@newfield.com' [Djordan@newfield.com]; Dresser, Chris [Dresser.Chris@epa.gov]; 'jpatterson@ndnlaw.com' [jpatterson@ndnlaw.com]; 'Jhirschi@enervest.net' [Jhirschi@enervest.net]; 'chelsea.cantrelle@epenergy.com' [chelsea.cantrelle@epenergy.com]; Morales, Monica [Morales.Monica@epa.gov]; 'Chad.Schlichtemeier@anadarko.com' [Chad.Schlichtemeier@anadarko.com]; 'Adrienne.Sandoval@andeavor.com' [Adrienne.Sandoval@andeavor.com]; 'kburdick@Duchesne.utah.gov' [kburdick@Duchesne.utah.gov]; 'joe.sager@epenergy.com' [joe.sager@epenergy.com]; 'ssiffring@westernenergyalliance.org' [ssiffring@westernenergyalliance.org]; 'Karen_Pratt@xtoenergy.com' [Karen_Pratt@xtoenergy.com]; 'mariek@utetribe.com' [mariek@utetribe.com]; 'jmathis@tricountyhealth.com' [jmathis@tricountyhealth.com]; 'marc.mansfield@usu.edu' [marc.mansfield@usu.edu]; 'Lolsen@altamontenergy.com' [Lolsen@altamontenergy.com]; 'jmcqueen@crescentpointenergy.com' [jmcqueen@crescentpointenergy.com]; 'John.Spencer@simplot.com' [John.Spencer@simplot.com]; Lexie Wilson [lexiewilson@utah.gov]; 'evernon@blm.gov' [evernon@blm.gov]; Smith, Claudia [Smith.Claudia@epa.gov]; 'eehrmantraut@SLRconsulting.com' [eehrmantraut@SLRconsulting.com]; 'wesadams@utah.gov' [wesadams@utah.gov]; 'amatheson@utah.gov' [amatheson@utah.gov]; 'Angela.Zivkovich@anadarko.com' [Angela.Zivkovich@anadarko.com]; 'Spencer_Kimball@eogresources.com' [Spencer_Kimball@eogresources.com]; 'ashley@publiclandsolutions.org' [ashley@publiclandsolutions.org]; 'dbrown@tricountyhealth.com' [dbrown@tricountyhealth.com]; Jackson, Scott [Jackson.Scott@epa.gov]; 'scottchew@le.utah.gov' [scottchew@le.utah.gov]; Garvey, Megan [garvey.megan@epa.gov]; 'Daniel.D.Pring@andeavor.com' [Daniel.D.Pring@andeavor.com]; 'seth.lyman@usu.edu' [seth.lyman@usu.edu]; minnieg@utetribe.com; 'cpennell@utah.gov' [cpennell@utah.gov]; 'woswald@utah.gov' [woswald@utah.gov]; 'bstringer@uintah.utah.gov' [bstringer@uintah.utah.gov]; 'bmensinger@trinityconsultants.com' [bmensinger@trinityconsultants.com]; 'jwoodland@crescentpointenergy.com' [jwoodland@crescentpointenergy.com]; 'Ryan.Clerico@enefit.com' [Ryan.Clerico@enefit.com]; 'mstewart@redleafinc.com' [mstewart@redleafinc.com]; 'Jean.semborski@cop.com' [Jean.semborski@cop.com]; 'trang.tran@usu.edu' [trang.tran@usu.edu]; 'val.oman@epenergy.com' [val.oman@epenergy.com]; 'rpage@ie-cos.com' [rpage@ie-cos.com]; 'Thomas.H.Gibbons@andeavor.com' [Thomas.H.Gibbons@andeavor.com]; 'dmcneill@utah.gov' [dmcneill@utah.gov]; 'Andrea.Olsen@Simplot.com' [Andrea.Olsen@Simplot.com]; 'Eoman@altamontenergy.com' [Eoman@altamontenergy.com]
CC: Tonnesen, Gail [Tonnesen.Gail@epa.gov]; 'irene@uintabasin.org' [irene@uintabasin.org]; 'Douglas.Jordan@encana.com' [Douglas.Jordan@encana.com]

Subject: Uinta Basin Ozone Working Group Meeting - agenda and video/call-in information
Location: Crossroads Community Center 50 E 200 S, Roosevelt, UT 84066

Start: 4/11/2019 8:30:00 PM
End: 4/11/2019 10:30:00 PM
Show Time As: Tentative

Recurrence: (none)

Appointment

From: Marie Bradshaw Durrant [MBDurrant@rqn.com]
Sent: 3/19/2019 10:40:14 PM
To: Marie Bradshaw Durrant [MBDurrant@rqn.com]; 'svance@utah.gov' [svance@utah.gov]; 'corey.jones@epenergy.com' [corey.jones@epenergy.com]; 'Rhammer@SLRconsulting.com' [Rhammer@SLRconsulting.com]; Nancy Daher [ndaher@utah.gov]; 'huy.tran@usu.edu' [huy.tran@usu.edu]; 'twiseman@utah.gov' [twiseman@utah.gov]; 'James.woodall@encana.com' [James.woodall@encana.com]; 'vince.christensen@simplot.com' [vince.christensen@simplot.com]; 'ttodd@utah.gov' [ttodd@utah.gov]; Beeler, Cindy [Beeler.Cindy@epa.gov]; 'gtodd@duchesne.utah.gov' [gtodd@duchesne.utah.gov]; 'amyc@utetribe.com' [amyc@utetribe.com]; 'Ryan.Swanson@epenergy.com' [Ryan.Swanson@epenergy.com]; 'debbie@breatheutah.org' [debbie@breatheutah.org]; miken@utetribe.com; 'CColclasure@bwenergylaw.com' [CColclasure@bwenergylaw.com]; 'rhrenko-browning@utahpetroleum.org' [rhrenko-browning@utahpetroleum.org]; Bean, Clayton [bean.clayton@epa.gov]; mberger@utah.gov; 'aaverett@sunrise-eng.com' [aaverett@sunrise-eng.com]; 'Ryan@kairosaerospace.com' [Ryan@kairosaerospace.com]; 'lonnief@utetribe.com' [lonnief@utetribe.com]; Ex. 6 Personal Privacy (PP) 'Djordan@newfield.com' [Djordan@newfield.com]; Dresser, Chris [Dresser.Chris@epa.gov]; 'jpatterson@ndnlaw.com' [jpatterson@ndnlaw.com]; 'Jhirschi@enervest.net' [Jhirschi@enervest.net]; 'chelsea.cantrelle@epenergy.com' [chelsea.cantrelle@epenergy.com]; Morales, Monica [Morales.Monica@epa.gov]; 'Chad.Schlichtemeier@anadarko.com' [Chad.Schlichtemeier@anadarko.com]; 'Adrienne.Sandoval@andeavor.com' [Adrienne.Sandoval@andeavor.com]; 'kburdick@Duchesne.utah.gov' [kburdick@Duchesne.utah.gov]; 'joe.sager@epenergy.com' [joe.sager@epenergy.com]; 'ssiffring@westernenergyalliance.org' [ssiffring@westernenergyalliance.org]; 'Karen_Pratt@xtoenergy.com' [Karen_Pratt@xtoenergy.com]; 'mariek@utetribe.com' [mariek@utetribe.com]; 'jmathis@tricountyhealth.com' [jmathis@tricountyhealth.com]; 'marc.mansfield@usu.edu' [marc.mansfield@usu.edu]; 'Lolsen@altamontenergy.com' [Lolsen@altamontenergy.com]; 'jmcqueen@crescentpointenergy.com' [jmcqueen@crescentpointenergy.com]; 'John.Spencer@simplot.com' [John.Spencer@simplot.com]; Lexie Wilson [lexiewilson@utah.gov]; 'evernon@blm.gov' [evernon@blm.gov]; Smith, Claudia [Smith.Claudia@epa.gov]; 'eehrmantraut@SLRconsulting.com' [eehrmantraut@SLRconsulting.com]; 'wesadams@utah.gov' [wesadams@utah.gov]; 'amatheson@utah.gov' [amatheson@utah.gov]; 'Angela.Zivkovich@anadarko.com' [Angela.Zivkovich@anadarko.com]; 'Spencer_Kimball@eogresources.com' [Spencer_Kimball@eogresources.com]; 'ashley@publiclandsolutions.org' [ashley@publiclandsolutions.org]; 'dbrown@tricountyhealth.com' [dbrown@tricountyhealth.com]; Jackson, Scott [Jackson.Scott@epa.gov]; 'scottchew@le.utah.gov' [scottchew@le.utah.gov]; Garvey, Megan [garvey.megan@epa.gov]; 'Daniel.D.Pring@andeavor.com' [Daniel.D.Pring@andeavor.com]; 'seth.lyman@usu.edu' [seth.lyman@usu.edu]; minnieg@utetribe.com; 'cpennell@utah.gov' [cpennell@utah.gov]; 'woswald@utah.gov' [woswald@utah.gov]; 'bstringer@uintah.utah.gov' [bstringer@uintah.utah.gov]; 'bmensinger@trinityconsultants.com' [bmensinger@trinityconsultants.com]; 'jwoodland@crescentpointenergy.com' [jwoodland@crescentpointenergy.com]; 'Ryan.Clerico@enefit.com' [Ryan.Clerico@enefit.com]; 'mstewart@redleafinc.com' [mstewart@redleafinc.com]; 'Jean.semborski@cop.com' [Jean.semborski@cop.com]; 'trang.tran@usu.edu' [trang.tran@usu.edu]; 'val.oman@epenergy.com' [val.oman@epenergy.com]; 'rpage@ie-cos.com' [rpage@ie-cos.com]; 'Thomas.H.Gibbons@andeavor.com' [Thomas.H.Gibbons@andeavor.com]; 'dmcneill@utah.gov' [dmcneill@utah.gov]; 'Andrea.Olsen@Simplot.com' [Andrea.Olsen@Simplot.com]; 'Eoman@altamontenergy.com' [Eoman@altamontenergy.com]
CC: Tonnesen, Gail [Tonnesen.Gail@epa.gov]; 'irene@uintabasin.org' [irene@uintabasin.org]; 'Douglas.Jordan@encana.com' [Douglas.Jordan@encana.com]

Subject: Uinta Basin Ozone Working Group Meeting - agenda and video/call-in information
Location: Crossroads Community Center 50 E 200 S, Roosevelt, UT 84066

Start: 4/11/2019 8:30:00 PM
End: 4/11/2019 10:30:00 PM
Show Time As: Tentative

Recurrence: (none)

Appointment

From: Marie Bradshaw Durrant [MBDurrant@rqn.com]
Sent: 3/19/2019 10:40:07 PM
To: 'aaverett@sunrise-eng.com' [aaverett@sunrise-eng.com]; 'Adrienne.Sandoval@andeavor.com' [Adrienne.Sandoval@andeavor.com]; 'amyc@utetribe.com' [amyc@utetribe.com]; 'Angela.Zivkovich@anadarko.com' [Angela.Zivkovich@anadarko.com]; 'ashley@publiclandsolutions.org' [ashley@publiclandsolutions.org]; 'bstringer@uintah.utah.gov' [bstringer@uintah.utah.gov]; 'Rhammer@SLRconsulting.com' [Rhammer@SLRconsulting.com]; 'bmensinger@trinityconsultants.com' [bmensinger@trinityconsultants.com]; 'Chad.Schlichtemeier@anadarko.com' [Chad.Schlichtemeier@anadarko.com]; 'chelsea.cantrelle@epenergy.com' [chelsea.cantrelle@epenergy.com]; 'CColclasure@bwenergylaw.com' [CColclasure@bwenergylaw.com]; Dresser, Chris [Dresser.Chris@epa.gov]; Beeler, Cindy [Beeler.Cindy@epa.gov]; Smith, Claudia [Smith.Claudia@epa.gov]; Bean, Clayton [bean.clayton@epa.gov]; 'corey.jones@epenergy.com' [corey.jones@epenergy.com]; 'Daniel.D.Pring@andeavor.com' [Daniel.D.Pring@andeavor.com]; 'dbrown@tricountyhealth.com' [dbrown@tricountyhealth.com]; 'dmcneill@utah.gov' [dmcneill@utah.gov]; 'debbie@breatheutah.org' [debbie@breatheutah.org]; 'Djordan@newfield.com' [Djordan@newfield.com]; 'Eoman@altamontenergy.com' [Eoman@altamontenergy.com]; 'eehrmantraut@SLRconsulting.com' [eehrmantraut@SLRconsulting.com]; 'evernon@blm.gov' [evernon@blm.gov]; 'gtodd@duchesne.utah.gov' [gtodd@duchesne.utah.gov]; 'huy.tran@usu.edu' [huy.tran@usu.edu]; 'jpatterson@ndnlaw.com' [jpatterson@ndnlaw.com]; 'James.woodall@encana.com' [James.woodall@encana.com]; 'jwoodland@crescentpointenergy.com' [jwoodland@crescentpointenergy.com]; 'Jean.semborski@cop.com' [Jean.semborski@cop.com]; 'joe.sager@epenergy.com' [joe.sager@epenergy.com]; 'John.Spencer@simplot.com' [John.Spencer@simplot.com]; **Ex. 6 Personal Privacy (PP)**; 'jmathis@tricountyhealth.com' [jmathis@tricountyhealth.com]; 'Jhirschi@enervest.net' [Jhirschi@enervest.net]; 'Karen_Pratt@xtoenergy.com' [Karen_Pratt@xtoenergy.com]; 'kburdick@Duchesne.utah.gov' [kburdick@Duchesne.utah.gov]; 'Lolsen@altamontenergy.com' [Lolsen@altamontenergy.com]; Lexie Wilson [lexiewilson@utah.gov]; 'lonnief@utetribe.com' [lonnief@utetribe.com]; 'mariek@utetribe.com' [mariek@utetribe.com]; 'marc.mansfield@usu.edu' [marc.mansfield@usu.edu]; mberger@utah.gov; 'mstewart@redleafinc.com' [mstewart@redleafinc.com]; Garvey, Megan [garvey.megan@epa.gov]; miken@utetribe.com; minnieg@utetribe.com; Morales, Monica [Morales.Monica@epa.gov]; 'rpage@ie-cos.com' [rpage@ie-cos.com]; 'rhrenko-browning@utahpetroleum.org' [rhrenko-browning@utahpetroleum.org]; 'Ryan.Clerico@enefit.com' [Ryan.Clerico@enefit.com]; 'Ryan@kairosaerospace.com' [Ryan@kairosaerospace.com]; 'Ryan.Swanson@epenergy.com' [Ryan.Swanson@epenergy.com]; 'scottchew@le.utah.gov' [scottchew@le.utah.gov]; Jackson, Scott [Jackson.Scott@epa.gov]; 'seth.lyman@usu.edu' [seth.lyman@usu.edu]; 'svance@utah.gov' [svance@utah.gov]; 'Spencer_Kimball@eogresources.com' [Spencer_Kimball@eogresources.com]; 'ssiffring@westernenergyalliance.org' [ssiffring@westernenergyalliance.org]; 'Thomas.H.Gibbons@andeavor.com' [Thomas.H.Gibbons@andeavor.com]; 'trang.tran@usu.edu' [trang.tran@usu.edu]; 'ttodd@utah.gov' [ttodd@utah.gov]; 'val.oman@epenergy.com' [val.oman@epenergy.com]; 'vince.christensen@simplot.com' [vince.christensen@simplot.com]; 'woswald@utah.gov' [woswald@utah.gov]; 'jmcqueen@crescentpointenergy.com' [jmcqueen@crescentpointenergy.com]; 'Andrea.Olsen@Simplot.com' [Andrea.Olsen@Simplot.com]; 'cpennell@utah.gov' [cpennell@utah.gov]; Nancy Daher [ndaher@utah.gov]; 'amatheson@utah.gov' [amatheson@utah.gov]; 'wesadams@utah.gov' [wesadams@utah.gov]; 'twiseman@utah.gov' [twiseman@utah.gov]

Subject: Uinta Basin Ozone Working Group Meeting - In Person If Possible!
Location: 50 E 200 S, Roosevelt, UT 84066

Start: 4/11/2019 8:30:00 PM
End: 4/11/2019 10:30:00 PM
Show Time As: Tentative

Recurrence: (none)

Appointment

From: Doris Vanden Akker [dvandenakker@RQN.COM]
Sent: 3/18/2019 6:14:37 PM
To: 'aaverett@sunrise-eng.com' [aaverett@sunrise-eng.com]; 'Adrienne.Sandoval@andeavor.com' [Adrienne.Sandoval@andeavor.com]; 'amyc@utetribe.com' [amyc@utetribe.com]; 'Angela.Zivkovich@anadarko.com' [Angela.Zivkovich@anadarko.com]; 'ashley@publiclandsolutions.org' [ashley@publiclandsolutions.org]; 'bstringer@uintah.utah.gov' [bstringer@uintah.utah.gov]; 'Rhammer@SLRconsulting.com' [Rhammer@SLRconsulting.com]; 'bmensinger@trinityconsultants.com' [bmensinger@trinityconsultants.com]; 'Chad.Schlichtemeier@anadarko.com' [Chad.Schlichtemeier@anadarko.com]; 'chelsea.cantrelle@epenergy.com' [chelsea.cantrelle@epenergy.com]; 'CColclasure@bwenergylaw.com' [CColclasure@bwenergylaw.com]; Dresser, Chris [Dresser.Chris@epa.gov]; Beeler, Cindy [Beeler.Cindy@epa.gov]; Smith, Claudia [Smith.Claudia@epa.gov]; Bean, Clayton [bean.clayton@epa.gov]; 'corey.jones@epenergy.com' [corey.jones@epenergy.com]; 'Daniel.D.Pring@andeavor.com' [Daniel.D.Pring@andeavor.com]; 'dbrown@tricountyhealth.com' [dbrown@tricountyhealth.com]; 'dmcneill@utah.gov' [dmcneill@utah.gov]; 'debbie@breatheutah.org' [debbie@breatheutah.org]; 'Djordan@newfield.com' [Djordan@newfield.com]; 'Eoman@altamontenergy.com' [Eoman@altamontenergy.com]; 'eehrmantraut@SLRconsulting.com' [eehrmantraut@SLRconsulting.com]; 'evernon@blm.gov' [evernon@blm.gov]; 'gtodd@duchesne.utah.gov' [gtodd@duchesne.utah.gov]; 'huy.tran@usu.edu' [huy.tran@usu.edu]; 'jpatterson@ndnlaw.com' [jpatterson@ndnlaw.com]; 'Jwoodall@newfield.com' [Jwoodall@newfield.com]; 'jwoodland@crescentpointenergy.com' [jwoodland@crescentpointenergy.com]; 'Jean.semborski@cop.com' [Jean.semborski@cop.com]; 'joe.sager@epenergy.com' [joe.sager@epenergy.com]; 'John.Spencer@simplot.com' [John.Spencer@simplot.com]; Ex. 6 Personal Privacy (PP); 'jmathis@tricountyhealth.com' [jmathis@tricountyhealth.com]; 'Jhirschi@enervest.net' [Jhirschi@enervest.net]; 'Karen_Pratt@xtoenergy.com' [Karen_Pratt@xtoenergy.com]; 'kburdick@Duchesne.utah.gov' [kburdick@Duchesne.utah.gov]; 'Lolsen@altamontenergy.com' [Lolsen@altamontenergy.com]; Lexie Wilson [lexiewilson@utah.gov]; 'lonnief@utetribe.com' [lonnief@utetribe.com]; Marie Bradshaw Durrant [MBDurrant@rqn.com]; 'mariek@utetribe.com' [mariek@utetribe.com]; 'marc.mansfield@usu.edu' [marc.mansfield@usu.edu]; mberger@utah.gov; 'mstewart@redleafinc.com' [mstewart@redleafinc.com]; Garvey, Megan [garvey.megan@epa.gov]; miken@utetribe.com; minnieg@utetribe.com; Morales, Monica [Morales.Monica@epa.gov]; 'rpage@ie-cos.com' [rpage@ie-cos.com]; 'rhrenko-browning@utahpetroleum.org' [rhrenko-browning@utahpetroleum.org]; 'Ryan.Clerico@enefit.com' [Ryan.Clerico@enefit.com]; 'Ryan@kairosaerospace.com' [Ryan@kairosaerospace.com]; 'Ryan.Swanson@epenergy.com' [Ryan.Swanson@epenergy.com]; 'scottchew@le.utah.gov' [scottchew@le.utah.gov]; Jackson, Scott [Jackson.Scott@epa.gov]; 'seth.lyman@usu.edu' [seth.lyman@usu.edu]; 'svance@utah.gov' [svance@utah.gov]; 'Spencer_Kimball@eogresources.com' [Spencer_Kimball@eogresources.com]; 'ssiffring@westernenergyalliance.org' [ssiffring@westernenergyalliance.org]; 'Thomas.H.Gibbons@andeavor.com' [Thomas.H.Gibbons@andeavor.com]; 'trang.tran@usu.edu' [trang.tran@usu.edu]; 'ttodd@utah.gov' [ttodd@utah.gov]; 'val.oman@epenergy.com' [val.oman@epenergy.com]; 'vince.christensen@simplot.com' [vince.christensen@simplot.com]; 'woswald@utah.gov' [woswald@utah.gov]; 'jmcqueen@crescentpointenergy.com' [jmcqueen@crescentpointenergy.com]; 'Andrea.Olsen@Simplot.com' [Andrea.Olsen@Simplot.com]; 'cpennell@utah.gov' [cpennell@utah.gov]; Nancy Daher [ndaher@utah.gov]; 'amatheson@utah.gov' [amatheson@utah.gov]; 'wesadams@utah.gov' [wesadams@utah.gov]

Subject: Uinta Basin Ozone Working Group Meeting
Location: Vernal, Salt Lake City, Denver

Start: 3/19/2019 8:00:00 PM
End: 3/19/2019 9:00:00 PM
Show Time As: Tentative

Recurrence: (none)

Appointment

From: Darrin Brown [dbrown@tricountyhealth.com]
Sent: 10/30/2018 9:51:33 PM
To: Garvey, Megan [garvey.megan@epa.gov]; Reed Page [rpage@ie-cos.com]; 'scottchew@le.utah.gov' [scottchew@le.utah.gov]; 'Adrienne.Sandoval@andeavor.com' [adrienne.sandoval@andeavor.com]; 'gtodd@duchesne.utah.gov' [gtodd@duchesne.utah.gov]; 'aaverett@sunrise-eng.com' [aaverett@sunrise-eng.com]; 'woswald@utah.gov' [woswald@utah.gov]; bstringer@uintah.utah.gov; 'kvantassell@le.utah.gov' [kvantassell@le.utah.gov]; 'joe.sager@epenergy.com' [joe.sager@epenergy.com]; 'jodyc@utetribe.com' [jodyc@utetribe.com]; 'ashley@publiclandsolutions.org' [ashley@publiclandsolutions.org]; Lexie Wilson [lexiewilson@utah.gov]; 'chelsea.cantrelle@epenergy.com' [chelsea.cantrelle@epenergy.com]; Dave McNeill [dmcneill@utah.gov]; mberger@utah.gov; 'evernon@blm.gov' [evernon@blm.gov]; miken@utetribe.com; 'seth.lyman@usu.edu' [seth.lyman@usu.edu]; 'jpatterson@ndnlaw.com' [jpatterson@ndnlaw.com]; 'huy.tran@usu.edu' [huy.tran@usu.edu]; 'marc.mansfield@usu.edu' [marc.mansfield@usu.edu]; 'Ryan.Clerico@energia.ee' [ryan.clerico@energia.ee]; 'svance@utah.gov' [svance@utah.gov]; 'lonnief@utetribe.com' [lonnief@utetribe.com]; 'j.woodland@crescentpointenergy.com' [j.woodland@crescentpointenergy.com]; 'trang.tran@usu.edu' [trang.tran@usu.edu]; 'amyc@utetribe.com' [amyc@utetribe.com]; Dresser, Chris [Dresser.Chris@epa.gov]; Jordan Mathis [jmathis@tricountyhealth.com]; minnieg@utetribe.com; 'mariek@utetribe.com' [mariek@utetribe.com]; 'debbie@breatheutah.org' [debbie@breatheutah.org]; 'ssiffring@westernenergyalliance.org' [ssiffring@westernenergyalliance.org]; Beeler, Cindy [Beeler.Cindy@epa.gov]

Subject: Invitation: Uinta Basin Ozone Working Group Meeting @ Tue Nov 27, 2018 2pm - 3pm (MST) (garvey.megan@epa.gov)
Location: USU Bingham Building, Room 101, Vernal and Ray Quinney & Nebeker, 36 South State Street, Suite 1400, SLC

Start: 11/27/2018 9:00:00 PM
End: 11/27/2018 10:00:00 PM
Show Time As: Tentative

Recurrence: (none)

Appointment

From: Marie Bradshaw Durrant [MBDurrant@rqn.com]
Sent: 11/27/2018 11:41:07 PM
To: Marie Durrant [MBDurrant@rqn.com]; 'dbrown@tricountyhealth.com' [dbrown@tricountyhealth.com]; 'vince.christensen@simplot.com' [vince.christensen@simplot.com]; 'kvantassell@le.utah.gov' [kvantassell@le.utah.gov]; Bean, Clayton [bean.clayton@epa.gov]; 'ashley@publiclandsolutions.org' [ashley@publiclandsolutions.org]; minnieg@utetribe.com; 'Lolsen@altamontenergy.com' [Lolsen@altamontenergy.com]; 'debbie@breatheutah.org' [debbie@breatheutah.org]; 'Chad.Schlichtemeier@anadarko.com' [Chad.Schlichtemeier@anadarko.com]; Smith, Claudia [Smith.Claudia@epa.gov]; 'rikki.hrenko-browning@enefit.com' [rikki.hrenko-browning@enefit.com]; Morales, Monica [Morales.Monica@epa.gov]; 'Jean.semborski@cop.com' [Jean.semborski@cop.com]; 'jmcqueen@crescentpointenergy.com' [jmcqueen@crescentpointenergy.com]; 'Thomas.H.Gibbons@andeavor.com' [Thomas.H.Gibbons@andeavor.com]; 'Ryan.Swanson@epenergy.com' [Ryan.Swanson@epenergy.com]; 'lonnief@utetribe.com' [lonnief@utetribe.com]; Ex. 6 Personal Privacy (PP)]; 'trang.tran@usu.edu' [trang.tran@usu.edu]; 'Rhammer@SLRconsulting.com' [Rhammer@SLRconsulting.com]; 'jmathis@tricountyhealth.com' [jmathis@tricountyhealth.com]; 'ssiffring@westernenergyalliance.org' [ssiffring@westernenergyalliance.org]; 'huy.tran@usu.edu' [huy.tran@usu.edu]; 'Ryan@kairosaerospace.com' [Ryan@kairosaerospace.com]; 'evernon@blm.gov' [evernon@blm.gov]; 'scottchew@le.utah.gov' [scottchew@le.utah.gov]; 'jwoodland@crescentpointenergy.com' [jwoodland@crescentpointenergy.com]; 'kburdick@Duchesne.utah.gov' [kburdick@Duchesne.utah.gov]; 'amyc@utetribe.com' [amyc@utetribe.com]; 'corey.jones@epenergy.com' [corey.jones@epenergy.com]; 'chelsea.cantrelle@epenergy.com' [chelsea.cantrelle@epenergy.com]; 'Ryan.Clerico@enefit.com' [Ryan.Clerico@enefit.com]; 'svance@utah.gov' [svance@utah.gov]; 'Jhirschi@enervest.net' [Jhirschi@enervest.net]; 'bstringer@uintah.utah.gov' [bstringer@uintah.utah.gov]; Dresser, Chris [Dresser.Chris@epa.gov]; miken@utetribe.com; 'eehrmantraut@SLRconsulting.com' [eehrmantraut@SLRconsulting.com]; 'bmensinger@trinityconsultants.com' [bmensinger@trinityconsultants.com]; 'mstewart@redleafinc.com' [mstewart@redleafinc.com]; mberger@utah.gov; 'Adrienne.Sandoval@andeavor.com' [Adrienne.Sandoval@andeavor.com]; 'rpage@ie-cos.com' [rpage@ie-cos.com]; 'gtodd@duchesne.utah.gov' [gtodd@duchesne.utah.gov]; 'seth.lyman@usu.edu' [seth.lyman@usu.edu]; 'mariek@utetribe.com' [mariek@utetribe.com]; 'CColclasure@bwenergylaw.com' [CColclasure@bwenergylaw.com]; Beeler, Cindy [Beeler.Cindy@epa.gov]; Garvey, Megan [garvey.megan@epa.gov]; 'Angela.Zivkovich@anadarko.com' [Angela.Zivkovich@anadarko.com]; 'Karen_Pratt@xtoenergy.com' [Karen_Pratt@xtoenergy.com]; 'Djordan@newfield.com' [Djordan@newfield.com]; 'Jwoodall@newfield.com' [Jwoodall@newfield.com]; 'woswald@utah.gov' [woswald@utah.gov]; 'aaverett@sunrise-eng.com' [aaverett@sunrise-eng.com]; Jackson, Scott [Jackson.Scott@epa.gov]; 'dmcneill@utah.gov' [dmcneill@utah.gov]; Lexie Wilson [lexiewilson@utah.gov]; 'joe.sager@epenergy.com' [joe.sager@epenergy.com]; 'Eoman@altamontenergy.com' [Eoman@altamontenergy.com]; 'Daniel.D.Pring@andeavor.com' [Daniel.D.Pring@andeavor.com]; 'ttodd@utah.gov' [ttodd@utah.gov]; 'Spencer_Kimball@eogresources.com' [Spencer_Kimball@eogresources.com]; 'val.oman@epenergy.com' [val.oman@epenergy.com]; 'John.Spencer@simplot.com' [John.Spencer@simplot.com]; 'marc.mansfield@usu.edu' [marc.mansfield@usu.edu]; 'jpatterson@ndnlaw.com' [jpatterson@ndnlaw.com]
CC: 'Semborski, Jean' [Jean.Semborski@conocophillips.com]; 'nhall@utah.gov' [nhall@utah.gov]; 'Olsen, Andrea' [andrea.olsen@Simplot.com]; Ex. 6 Personal Privacy (PP)

Subject: Uinta Basin Working Group Meeting
Location: Vernal, Salt Lake City, Denver

Start: 1/8/2019 9:00:00 PM
End: 1/8/2019 10:00:00 PM
Show Time As: Tentative

Recurrence: (none)

Appointment

From: Marie Durrant [MBDurrant@rqn.com]
Sent: 11/21/2018 11:16:44 PM
To: Marie Durrant [MBDurrant@rqn.com]; 'aaverett@sunrise-eng.com' [aaverett@sunrise-eng.com]; 'Adrienne.Sandoval@andeavor.com' [Adrienne.Sandoval@andeavor.com]; 'amyc@utetribe.com' [amyc@utetribe.com]; 'Angela.Zivkovich@anadarko.com' [Angela.Zivkovich@anadarko.com]; 'ashley@publiclandsolutions.org' [ashley@publiclandsolutions.org]; 'bstringer@uintah.utah.gov' [bstringer@uintah.utah.gov]; 'Rhammer@SLRconsulting.com' [Rhammer@SLRconsulting.com]; 'bmensinger@trinityconsultants.com' [bmensinger@trinityconsultants.com]; 'Chad.Schlichtemeier@anadarko.com' [Chad.Schlichtemeier@anadarko.com]; 'chelsea.cantrelle@epenergy.com' [chelsea.cantrelle@epenergy.com]; 'CColclasure@bwenergylaw.com' [CColclasure@bwenergylaw.com]; Dresser, Chris [Dresser.Chris@epa.gov]; Beeler, Cindy [Beeler.Cindy@epa.gov]; Smith, Claudia [Smith.Claudia@epa.gov]; Bean, Clayton [bean.clayton@epa.gov]; 'corey.jones@epenergy.com' [corey.jones@epenergy.com]; 'Daniel.D.Pring@andeavor.com' [Daniel.D.Pring@andeavor.com]; 'dbrown@tricountyhealth.com' [dbrown@tricountyhealth.com]; 'dmcneill@utah.gov' [dmcneill@utah.gov]; 'debbie@breatheutah.org' [debbie@breatheutah.org]; 'Djordan@newfield.com' [Djordan@newfield.com]; 'Eoman@altamontenergy.com' [Eoman@altamontenergy.com]; 'eehrmantraut@SLRconsulting.com' [eehrmantraut@SLRconsulting.com]; 'evernon@blm.gov' [evernon@blm.gov]; 'gtodd@duchesne.utah.gov' [gtodd@duchesne.utah.gov]; 'huy.tran@usu.edu' [huy.tran@usu.edu]; 'jpatterson@ndnlaw.com' [jpatterson@ndnlaw.com]; 'Jwoodall@newfield.com' [Jwoodall@newfield.com]; 'jwoodland@crescentpointenergy.com' [jwoodland@crescentpointenergy.com]; 'Jean.semborski@cop.com' [Jean.semborski@cop.com]; 'joe.sager@epenergy.com' [joe.sager@epenergy.com]; 'John.Spencer@simplot.com' [John.Spencer@simplot.com]; Ex. 6 Personal Privacy (PP) ; 'jmathis@tricountyhealth.com' [jmathis@tricountyhealth.com]; 'Jhirschi@enervest.net' [Jhirschi@enervest.net]; 'Karen_Pratt@xtoenergy.com' [Karen_Pratt@xtoenergy.com]; 'kburdick@Duchesne.utah.gov' [kburdick@Duchesne.utah.gov]; 'kvantassell@le.utah.gov' [kvantassell@le.utah.gov]; 'Lolsen@altamontenergy.com' [Lolsen@altamontenergy.com]; Lexie Wilson [lexiewilson@utah.gov]; 'lonnief@utetribe.com' [lonnief@utetribe.com]; 'mariek@utetribe.com' [mariek@utetribe.com]; 'marc.mansfield@usu.edu' [marc.mansfield@usu.edu]; mberger@utah.gov; 'mstewart@redleafinc.com' [mstewart@redleafinc.com]; Garvey, Megan [garvey.megan@epa.gov]; miken@utetribe.com; minnieg@utetribe.com; Morales, Monica [Morales.Monica@epa.gov]; 'rpage@ie-cos.com' [rpage@ie-cos.com]; 'rikki.hrenko-browning@enefit.com' [rikki.hrenko-browning@enefit.com]; 'Ryan.Clerico@enefit.com' [Ryan.Clerico@enefit.com]; 'Ryan@kairosaerospace.com' [Ryan@kairosaerospace.com]; 'Ryan.Swanson@epenergy.com' [Ryan.Swanson@epenergy.com]; 'scottchew@le.utah.gov' [scottchew@le.utah.gov]; Jackson, Scott [Jackson.Scott@epa.gov]; 'seth.lyman@usu.edu' [seth.lyman@usu.edu]; 'svance@utah.gov' [svance@utah.gov]; 'Spencer_Kimball@eogresources.com' [Spencer_Kimball@eogresources.com]; 'ssiffring@westernenergyalliance.org' [ssiffring@westernenergyalliance.org]; 'Thomas.H.Gibbons@andeavor.com' [Thomas.H.Gibbons@andeavor.com]; 'trang.tran@usu.edu' [trang.tran@usu.edu]; 'ttodd@utah.gov' [ttodd@utah.gov]; 'val.oman@epenergy.com' [val.oman@epenergy.com]; 'vince.christensen@simplot.com' [vince.christensen@simplot.com]; 'woswald@utah.gov' [woswald@utah.gov]; 'jmcqueen@crescentpointenergy.com' [jmcqueen@crescentpointenergy.com]; Doris Vanden Akker [dvandenakker@RQN.COM]

Subject: Uinta Basin Ozone Working Group
Attachments: UBOWG Draft Agenda 11-27-18.docx
Location: Vernal, Salt Lake City, Denver

Start: 11/27/2018 9:00:00 PM
End: 11/27/2018 11:00:00 PM
Show Time As: Tentative

Recurrence: (none)

- Vernal - USU campus in Vernal (320 N. Aggie Blvd.) in Room 101. Come through the main entrance, and it is the first door on your left.
- Salt Lake City - Ray Quinney & Nebeker, 36 South State Street, Suite 1400
- Denver – EPA Region 8, 1595 Wynkoop St. (ask for Chris Dresser)

•

Proposed Agenda for Uinta Basin Ozone Working Group

1. Organizational Discussion: Revisiting Goals/Objectives/Expectations:
    a. Proposed Modifications to **Mission Statement** (redlined to show changes): The Uinta Basin Ozone Working Group Work brings together tribal and government decision-makers, stakeholders, and experts in an effort to ~~prevent a Moderate designation for the Basin in three years~~ find solutions to help the Uinta Basin achieve attainment of the ozone standard. The UBOWG aims to foster collaboration, develop mutual understanding, and benefit from collective knowledge and synergies to identify:
        i. effective, economically viable measures to reduce ozone levels in the Basin
        ii. roadblocks to future environmentally responsible development
        iii. ~~policies,~~ public information, educational resources, and beneficial actions to support ozone level reductions
    b. Reminder of group working methods:
        i. Mutually respectful – all groups participating are interested in reducing ozone levels in the Uinta Basin and bring different skills, perspectives, and areas of influence to the table
        ii. Outcome oriented – suggestions/proposals should be outcome- rather than agenda-oriented
        iii. Data/logical support framework – as much as possible, strategies and proposals should be supported with data to show effect/usefulness
        iv. Constructive – presenting concerns and objections is a valuable part of the collaborative process, and we expect such barriers as high cost, ineffectiveness, and social resistance to be identified. The purpose of this working group is to solve a collective problem, and raising concerns should be targeted towards finding solutions rather than airing grievances.
    c. Discussion on consolidation of working groups (Marie Durrant (Ray Quinney & Nebeker), Stuart Siffring (Western Energy Alliance), Rikki Hrenko (Enefit/Utah Petroleum Association)
        i. Amount of meetings, overlap and industry desire to participate in all aspects are main drivers
        ii. Aligning work with existing and forth-coming regulations rather than getting bogged down in abstract policy debates
        iii. Development of steering committee to guide group focus and meeting agendas with representatives from industry, state and tribal regulators, state governmental representatives, technical/academic sector, environmental and appropriate federal involvement/feedback
2. Working Group Focus Areas:
    a. Regulatory discussion on current state of permitting (EPA and DAQ)
        i. FIP update, NANSR on tribe and or state lands
        ii. Efforts and challenges related to developing emission reduction credits (Debbie Burney-Sigman (Breathe Utah), Stuart Siffring (Western Energy Alliance)

iii. Offsets/Credits and regulatory impact of potential retrofit rules

b. Industry's voluntary reduction program (Stuart Siffring (Western Energy Alliance; Karen Pratt (XTO Energy))
    i. Planned list of voluntary seasonal controls, rollout timeframe this year?
    ii. Informal EPA/UDAQ reward program to reward operators?

c. Emission Inventory and Modeling effort update and request for industry advisory group
    i. Brief background
    ii. Can we improve emission inventories?
    iii. What is the status of the modeling?
    iv. How can we improve the modeling?

d. Experience with other ozone efforts
    i. Similar situations update
    ii. DJ Basin Operator work for summer ozone, contingency plans (Industry)

e. Public Relations and Education (Debbie Burney-Sigman (Breathe Utah), Stuart Siffring (Western Energy Alliance), Karen Pratt (XTO Energy), Marie Durrant (Ray Quinney & Nebeker)
    i. What are the anticipated outputs of this workgroup and what PR/education activities are anticipated?
    ii. Do we need to develop further educational materials?
    iii. Where will these materials live?
    iv. Process for approving public documents and work products

3. Revisiting group decision making

4. Broader Issues/Outstanding Questions:
    a. Is it even possible to prevent a future moderate designation?
    b. Are there other goals this group should be cognizant of besides reducing ozone?
    c. What are end products we are aiming for? How can we produce effective products in large-group setting?
    d. What is a realistic timeline to reach goals? How long does this group intend to continue?

5. Time and Agenda for next meeting

Appointment

From: Marie Durrant [MBDurrant@rqn.com]
Sent: 11/27/2018 11:40:58 PM
To: 'aaverett@sunrise-eng.com' [aaverett@sunrise-eng.com]; 'Adrienne.Sandoval@andeavor.com' [Adrienne.Sandoval@andeavor.com]; 'amyc@utetribe.com' [amyc@utetribe.com]; 'Angela.Zivkovich@anadarko.com' [Angela.Zivkovich@anadarko.com]; 'ashley@publiclandsolutions.org' [ashley@publiclandsolutions.org]; 'bstringer@uintah.utah.gov' [bstringer@uintah.utah.gov]; 'Rhammer@SLRconsulting.com' [Rhammer@SLRconsulting.com]; 'bmensinger@trinityconsultants.com' [bmensinger@trinityconsultants.com]; 'Chad.Schlichtemeier@anadarko.com' [Chad.Schlichtemeier@anadarko.com]; 'chelsea.cantrelle@epenergy.com' [chelsea.cantrelle@epenergy.com]; 'CColclasure@bwenergylaw.com' [CColclasure@bwenergylaw.com]; Dresser, Chris [Dresser.Chris@epa.gov]; Beeler, Cindy [Beeler.Cindy@epa.gov]; Smith, Claudia [Smith.Claudia@epa.gov]; Bean, Clayton [bean.clayton@epa.gov]; 'corey.jones@epenergy.com' [corey.jones@epenergy.com]; 'Daniel.D.Pring@andeavor.com' [Daniel.D.Pring@andeavor.com]; 'dbrown@tricountyhealth.com' [dbrown@tricountyhealth.com]; 'dmcneill@utah.gov' [dmcneill@utah.gov]; 'debbie@breatheutah.org' [debbie@breatheutah.org]; 'Djordan@newfield.com' [Djordan@newfield.com]; 'Eoman@altamontenergy.com' [Eoman@altamontenergy.com]; 'eehrmantraut@SLRconsulting.com' [eehrmantraut@SLRconsulting.com]; 'evernon@blm.gov' [evernon@blm.gov]; 'gtodd@duchesne.utah.gov' [gtodd@duchesne.utah.gov]; 'huy.tran@usu.edu' [huy.tran@usu.edu]; 'jpatterson@ndnlaw.com' [jpatterson@ndnlaw.com]; 'Jwoodall@newfield.com' [Jwoodall@newfield.com]; 'jwoodland@crescentpointenergy.com' [jwoodland@crescentpointenergy.com]; 'Jean.semborski@cop.com' [Jean.semborski@cop.com]; 'joe.sager@epenergy.com' [joe.sager@epenergy.com]; 'John.Spencer@simplot.com' [John.Spencer@simplot.com]; **Ex. 6 Personal Privacy (PP)**; 'jmathis@tricountyhealth.com' [jmathis@tricountyhealth.com]; 'Jhirschi@enervest.net' [Jhirschi@enervest.net]; 'Karen_Pratt@xtoenergy.com' [Karen_Pratt@xtoenergy.com]; 'kburdick@Duchesne.utah.gov' [kburdick@Duchesne.utah.gov]; 'kvantassell@le.utah.gov' [kvantassell@le.utah.gov]; 'Lolsen@altamontenergy.com' [Lolsen@altamontenergy.com]; Lexie Wilson [lexiewilson@utah.gov]; 'lonnief@utetribe.com' [lonnief@utetribe.com]; 'mariek@utetribe.com' [mariek@utetribe.com]; 'marc.mansfield@usu.edu' [marc.mansfield@usu.edu]; mberger@utah.gov; 'mstewart@redleafinc.com' [mstewart@redleafinc.com]; Garvey, Megan [garvey.megan@epa.gov]; miken@utetribe.com; minnieg@utetribe.com; Morales, Monica [Morales.Monica@epa.gov]; 'rpage@ie-cos.com' [rpage@ie-cos.com]; 'rikki.hrenko-browning@enefit.com' [rikki.hrenko-browning@enefit.com]; 'Ryan.Clerico@enefit.com' [Ryan.Clerico@enefit.com]; 'Ryan@kairosaerospace.com' [Ryan@kairosaerospace.com]; 'Ryan.Swanson@epenergy.com' [Ryan.Swanson@epenergy.com]; 'scottchew@le.utah.gov' [scottchew@le.utah.gov]; Jackson, Scott [Jackson.Scott@epa.gov]; 'seth.lyman@usu.edu' [seth.lyman@usu.edu]; 'svance@utah.gov' [svance@utah.gov]; 'Spencer_Kimball@eogresources.com' [Spencer_Kimball@eogresources.com]; 'ssiffring@westernenergyalliance.org' [ssiffring@westernenergyalliance.org]; 'Thomas.H.Gibbons@andeavor.com' [Thomas.H.Gibbons@andeavor.com]; 'trang.tran@usu.edu' [trang.tran@usu.edu]; 'ttodd@utah.gov' [ttodd@utah.gov]; 'val.oman@epenergy.com' [val.oman@epenergy.com]; 'vince.christensen@simplot.com' [vince.christensen@simplot.com]; 'woswald@utah.gov' [woswald@utah.gov]; 'jmcqueen@crescentpointenergy.com' [jmcqueen@crescentpointenergy.com]

Subject: Uinta Basin Working Group Meeting
Location: Vernal, Salt Lake City, Denver

Start: 1/8/2019 9:00:00 PM
End: 1/8/2019 11:00:00 PM
Show Time As: Tentative

Recurrence: (none)

Appointment

From: Marie Durrant [MBDurrant@rqn.com]
Sent: 10/9/2018 5:12:21 PM
To: Marie Durrant [MBDurrant@rqn.com]; 'aaverett@sunrise-eng.com' [aaverett@sunrise-eng.com]; 'Adrienne.Sandoval@andeavor.com' [Adrienne.Sandoval@andeavor.com]; 'amyc@utetribe.com' [amyc@utetribe.com]; 'Angela.Zivkovich@anadarko.com' [Angela.Zivkovich@anadarko.com]; 'ashley@publiclandsolutions.org' [ashley@publiclandsolutions.org]; 'bstringer@uintah.utah.gov' [bstringer@uintah.utah.gov]; 'Rhammer@SLRconsulting.com' [Rhammer@SLRconsulting.com]; 'Chad.Schlichtemeier@anadarko.com' [Chad.Schlichtemeier@anadarko.com]; 'chelsea.cantrelle@epenergy.com' [chelsea.cantrelle@epenergy.com]; Dresser, Chris [Dresser.Chris@epa.gov]; Beeler, Cindy [Beeler.Cindy@epa.gov]; Smith, Claudia [Smith.Claudia@epa.gov]; 'dbrown@tricountyhealth.com' [dbrown@tricountyhealth.com]; 'dmcneill@utah.gov' [dmcneill@utah.gov]; 'debbie@breatheutah.org' [debbie@breatheutah.org]; 'Djordan@newfield.com' [Djordan@newfield.com]; 'Eoman@altamontenergy.com' [Eoman@altamontenergy.com]; 'eehrmantraut@SLRconsulting.com' [eehrmantraut@SLRconsulting.com]; 'evernon@blm.gov' [evernon@blm.gov]; 'gtodd@duchesne.utah.gov' [gtodd@duchesne.utah.gov]; 'huy.tran@usu.edu' [huy.tran@usu.edu]; 'jpatterson@ndnlaw.com' [jpatterson@ndnlaw.com]; 'j.woodland@crescentpointenergy.com' [j.woodland@crescentpointenergy.com]; 'joe.sager@epenergy.com' [joe.sager@epenergy.com]; 'John.Spencer@simplot.com' [John.Spencer@simplot.com]; 'jmathis@tricountyhealth.com' [jmathis@tricountyhealth.com]; 'Jhirschi@enervest.net' [Jhirschi@enervest.net]; 'kburdick@Duchesne.utah.gov' [kburdick@Duchesne.utah.gov]; 'kvantassell@le.utah.gov' [kvantassell@le.utah.gov]; 'Lolsen@altamontenergy.com' [Lolsen@altamontenergy.com]; Lexie Wilson [lexiewilson@utah.gov]; 'lonnief@utetribe.com' [lonnief@utetribe.com]; 'mariek@utetribe.com' [mariek@utetribe.com]; 'marc.mansfield@usu.edu' [marc.mansfield@usu.edu]; mberger@utah.gov; 'mstewart@redleafinc.com' [mstewart@redleafinc.com]; Garvey, Megan [garvey.megan@epa.gov]; miken@utetribe.com; minnieg@utetribe.com; Morales, Monica [Morales.Monica@epa.gov]; 'rpage@ie-cos.com' [rpage@ie-cos.com]; 'rikki.hrenko@enefitamericanoil.com' [rikki.hrenko@enefitamericanoil.com]; 'Ryan.Clerico@enefit.com' [Ryan.Clerico@enefit.com]; 'scottchew@le.utah.gov' [scottchew@le.utah.gov]; 'seth.lyman@usu.edu' [seth.lyman@usu.edu]; 'svance@utah.gov' [svance@utah.gov]; 'Spencer_Kimball@eogresources.com' [Spencer_Kimball@eogresources.com]; 'ssiffring@westernenergyalliance.org' [ssiffring@westernenergyalliance.org]; 'Thomas.H.Gibbons@andeavor.com' [Thomas.H.Gibbons@andeavor.com]; 'trang.tran@usu.edu' [trang.tran@usu.edu]; 'ttodd@utah.gov' [ttodd@utah.gov]; 'val.oman@epenergy.com' [val.oman@epenergy.com]; 'vince.christensen@simplot.com' [vince.christensen@simplot.com]; 'woswald@utah.gov' [woswald@utah.gov]; Ex. 6 Personal Privacy (PP) 'Karen_Pratt@xtoenergy.com' [Karen_Pratt@xtoenergy.com]

Subject: Uinta Basin Ozone Working Group Meeting
Location: Vernal, Salt Lake City, Denver

Start: 10/30/2018 8:00:00 PM
End: 10/30/2018 10:00:00 PM
Show Time As: Busy

Recurrence: (none)

Appointment

From: Doris Vanden Akker [dvandenakker@RQN.COM]
Sent: 10/18/2018 2:51:53 PM
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Subject: Canceled: 7. Public relations and education: Public relations and educational materials for general public
Location: Uinta Basin Ozone Working Group

Start: 10/24/2018 8:00:00 PM
End: 10/24/2018 9:00:00 PM
Show Time As: Free

Importance: High

Recurrence: (none)

Appointment

From: Doris Vanden Akker [dvandenakker@RQN.COM]
Sent: 2/13/2019 10:39:51 PM
To: Doris Vanden Akker [dvandenakker@RQN.COM]; 'aaverett@sunrise-eng.com' [aaverett@sunrise-eng.com]; 'Adrienne.Sandoval@andeavor.com' [Adrienne.Sandoval@andeavor.com]; 'amyc@utetribe.com' [amyc@utetribe.com]; 'Angela.Zivkovich@anadarko.com' [Angela.Zivkovich@anadarko.com]; 'ashley@publiclandsolutions.org' [ashley@publiclandsolutions.org]; 'bstringer@uintah.utah.gov' [bstringer@uintah.utah.gov]; 'Rhammer@SLRconsulting.com' [Rhammer@SLRconsulting.com]; 'bmensinger@trinityconsultants.com' [bmensinger@trinityconsultants.com]; 'Chad.Schlichtemeier@anadarko.com' [Chad.Schlichtemeier@anadarko.com]; 'chelsea.cantrelle@epenergy.com' [chelsea.cantrelle@epenergy.com]; 'CColclasure@bwenergylaw.com' [CColclasure@bwenergylaw.com]; Dresser, Chris [Dresser.Chris@epa.gov]; Beeler, Cindy [Beeler.Cindy@epa.gov]; Smith, Claudia [Smith.Claudia@epa.gov]; Bean, Clayton [bean.clayton@epa.gov]; 'corey.jones@epenergy.com' [corey.jones@epenergy.com]; 'Daniel.D.Pring@andeavor.com' [Daniel.D.Pring@andeavor.com]; 'dbrown@tricountyhealth.com' [dbrown@tricountyhealth.com]; 'dmcneill@utah.gov' [dmcneill@utah.gov]; 'debbie@breatheutah.org' [debbie@breatheutah.org]; 'Djordan@newfield.com' [Djordan@newfield.com]; 'Eoman@altamontenergy.com' [Eoman@altamontenergy.com]; 'eehrmantraut@SLRconsulting.com' [eehrmantraut@SLRconsulting.com]; 'evernon@blm.gov' [evernon@blm.gov]; 'gtodd@duchesne.utah.gov' [gtodd@duchesne.utah.gov]; 'huy.tran@usu.edu' [huy.tran@usu.edu]; 'jpatterson@ndnlaw.com' [jpatterson@ndnlaw.com]; 'Jwoodall@newfield.com' [Jwoodall@newfield.com]; 'jwoodland@crescentpointenergy.com' [jwoodland@crescentpointenergy.com]; 'Jean.semborski@cop.com' [Jean.semborski@cop.com]; 'joe.sager@epenergy.com' [joe.sager@epenergy.com]; 'John.Spencer@simplot.com' [John.Spencer@simplot.com]; **Ex. 6 Personal Privacy (PP)**; 'jmathis@tricountyhealth.com' [jmathis@tricountyhealth.com]; 'Jhirschi@enervest.net' [Jhirschi@enervest.net]; 'Karen_Pratt@xtoenergy.com' [Karen_Pratt@xtoenergy.com]; 'kburdick@Duchesne.utah.gov' [kburdick@Duchesne.utah.gov]; 'Lolsen@altamontenergy.com' [Lolsen@altamontenergy.com]; Lexie Wilson [lexiewilson@utah.gov]; 'lonnief@utetribe.com' [lonnief@utetribe.com]; Marie Bradshaw Durrant [MBDurrant@rqn.com]; 'mariek@utetribe.com' [mariek@utetribe.com]; 'marc.mansfield@usu.edu' [marc.mansfield@usu.edu]; mberger@utah.gov; 'mstewart@redleafinc.com' [mstewart@redleafinc.com]; Garvey, Megan [garvey.megan@epa.gov]; miken@utetribe.com; minnieg@utetribe.com; Morales, Monica [Morales.Monica@epa.gov]; 'rpage@ie-cos.com' [rpage@ie-cos.com]; 'rhrenko-browning@utahpetroleum.org' [rhrenko-browning@utahpetroleum.org]; 'Ryan.Clerico@enefit.com' [Ryan.Clerico@enefit.com]; 'Ryan@kairosaerospace.com' [Ryan@kairosaerospace.com]; 'Ryan.Swanson@epenergy.com' [Ryan.Swanson@epenergy.com]; 'scottchew@le.utah.gov' [scottchew@le.utah.gov]; Jackson, Scott [Jackson.Scott@epa.gov]; 'seth.lyman@usu.edu' [seth.lyman@usu.edu]; 'svance@utah.gov' [svance@utah.gov]; 'Spencer_Kimball@eogresources.com' [Spencer_Kimball@eogresources.com]; 'ssiffring@westernenergyalliance.org' [ssiffring@westernenergyalliance.org]; 'Thomas.H.Gibbons@andeavor.com' [Thomas.H.Gibbons@andeavor.com]; 'trang.tran@usu.edu' [trang.tran@usu.edu]; 'ttodd@utah.gov' [ttodd@utah.gov]; 'val.oman@epenergy.com' [val.oman@epenergy.com]; 'vince.christensen@simplot.com' [vince.christensen@simplot.com]; 'woswald@utah.gov' [woswald@utah.gov]; 'jmcqueen@crescentpointenergy.com' [jmcqueen@crescentpointenergy.com]; 'Andrea.Olsen@Simplot.com' [Andrea.Olsen@Simplot.com]; 'cpennell@utah.gov' [cpennell@utah.gov]; Nancy Daher [ndaher@utah.gov]; 'amatheson@utah.gov' [amatheson@utah.gov]

Subject: Uinta Basin Ozone Working Group Meeting
Location: Vernal, Salt Lake City, Denver

Start: 3/19/2019 8:00:00 PM
End: 3/19/2019 9:00:00 PM
Show Time As: Tentative

Recurrence: (none)

Appointment

From: Doris Vanden Akker [dvandenakker@RQN.COM]
Sent: 9/28/2018 8:55:29 PM
To: Doris Vanden Akker [dvandenakker@RQN.COM]; 'aaverett@sunrise-eng.com' [aaverett@sunrise-eng.com]; 'Adrienne.Sandoval@andeavor.com' [Adrienne.Sandoval@andeavor.com]; 'amyc@utetribe.com' [amyc@utetribe.com]; 'Angela.Zivkovich@anadarko.com' [Angela.Zivkovich@anadarko.com]; 'ashley@publiclandsolutions.org' [ashley@publiclandsolutions.org]; 'bstringer@uintah.utah.gov' [bstringer@uintah.utah.gov]; 'Rhammer@SLRconsulting.com' [Rhammer@SLRconsulting.com]; 'Chad.Schlichtemeier@anadarko.com' [Chad.Schlichtemeier@anadarko.com]; 'chelsea.cantrelle@epenergy.com' [chelsea.cantrelle@epenergy.com]; Dresser, Chris [Dresser.Chris@epa.gov]; Beeler, Cindy [Beeler.Cindy@epa.gov]; Smith, Claudia [Smith.Claudia@epa.gov]; 'dbrown@tricountyhealth.com' [dbrown@tricountyhealth.com]; 'dmcneill@utah.gov' [dmcneill@utah.gov]; 'debbie@breatheutah.org' [debbie@breatheutah.org]; 'Djordan@newfield.com' [Djordan@newfield.com]; 'Eoman@altamontenergy.com' [Eoman@altamontenergy.com]; 'eehrmantraut@SLRconsulting.com' [eehrmantraut@SLRconsulting.com]; 'evernon@blm.gov' [evernon@blm.gov]; 'gtodd@duchesne.utah.gov' [gtodd@duchesne.utah.gov]; 'huy.tran@usu.edu' [huy.tran@usu.edu]; 'jpatterson@ndnlaw.com' [jpatterson@ndnlaw.com]; 'j.woodland@crescentpointenergy.com' [j.woodland@crescentpointenergy.com]; 'joe.sager@epenergy.com' [joe.sager@epenergy.com]; 'John.Spencer@simplot.com' [John.Spencer@simplot.com]; 'jmathis@tricountyhealth.com' [jmathis@tricountyhealth.com]; 'Jhirschi@enervest.net' [Jhirschi@enervest.net]; 'kburdick@Duchesne.utah.gov' [kburdick@Duchesne.utah.gov]; 'kvantassell@le.utah.gov' [kvantassell@le.utah.gov]; 'Lolsen@altamontenergy.com' [Lolsen@altamontenergy.com]; Lexie Wilson [lexiewilson@utah.gov]; 'lonnief@utetribe.com' [lonnief@utetribe.com]; Marie Durrant [MBDurrant@rqn.com]; 'mariek@utetribe.com' [mariek@utetribe.com]; 'marc.mansfield@usu.edu' [marc.mansfield@usu.edu]; mberger@utah.gov; 'mstewart@redleafinc.com' [mstewart@redleafinc.com]; Garvey, Megan [garvey.megan@epa.gov]; miken@utetribe.com; minnieg@utetribe.com; Morales, Monica [Morales.Monica@epa.gov]; 'rpage@ie-cos.com' [rpage@ie-cos.com]; 'rikki.hrenko@enefitamericanoil.com' [rikki.hrenko@enefitamericanoil.com]; 'Ryan.Clerico@enefit.com' [Ryan.Clerico@enefit.com]; 'scottchew@le.utah.gov' [scottchew@le.utah.gov]; 'seth.lyman@usu.edu' [seth.lyman@usu.edu]; 'svance@utah.gov' [svance@utah.gov]; 'Spencer_Kimball@eogresources.com' [Spencer_Kimball@eogresources.com]; 'ssiffring@westernenergyalliance.org' [ssiffring@westernenergyalliance.org]; 'Thomas.H.Gibbons@andeavor.com' [Thomas.H.Gibbons@andeavor.com]; 'trang.tran@usu.edu' [trang.tran@usu.edu]; 'ttodd@utah.gov' [ttodd@utah.gov]; 'val.oman@epenergy.com' [val.oman@epenergy.com]; 'vince.christensen@simplot.com' [vince.christensen@simplot.com]; 'woswald@utah.gov' [woswald@utah.gov]; Ex. 6 Personal Privacy (PP)]

Subject: Canceled: 7. Public relations and education: Public relations and educational materials for general public
Location: Uinta Basin Ozone Working Group

Start: 10/24/2018 8:00:00 PM
End: 10/24/2018 9:00:00 PM
Show Time As: Free

Importance: High

Recurrence: (none)

Appointment

From: Doris Vanden Akker [dvandenakker@RQN.COM]
Sent: 2/13/2019 10:39:51 PM
To: Doris Vanden Akker [dvandenakker@RQN.COM]; 'aaverett@sunrise-eng.com' [aaverett@sunrise-eng.com]; 'Adrienne.Sandoval@andeavor.com' [Adrienne.Sandoval@andeavor.com]; 'amyc@utetribe.com' [amyc@utetribe.com]; 'Angela.Zivkovich@anadarko.com' [Angela.Zivkovich@anadarko.com]; 'ashley@publiclandsolutions.org' [ashley@publiclandsolutions.org]; 'bstringer@uintah.utah.gov' [bstringer@uintah.utah.gov]; 'Rhammer@SLRconsulting.com' [Rhammer@SLRconsulting.com]; 'bmensinger@trinityconsultants.com' [bmensinger@trinityconsultants.com]; 'Chad.Schlichtemeier@anadarko.com' [Chad.Schlichtemeier@anadarko.com]; 'chelsea.cantrelle@epenergy.com' [chelsea.cantrelle@epenergy.com]; 'CColclasure@bwenergylaw.com' [CColclasure@bwenergylaw.com]; Dresser, Chris [Dresser.Chris@epa.gov]; Beeler, Cindy [Beeler.Cindy@epa.gov]; Smith, Claudia [Smith.Claudia@epa.gov]; Bean, Clayton [bean.clayton@epa.gov]; 'corey.jones@epenergy.com' [corey.jones@epenergy.com]; 'Daniel.D.Pring@andeavor.com' [Daniel.D.Pring@andeavor.com]; 'dbrown@tricountyhealth.com' [dbrown@tricountyhealth.com]; 'dmcneill@utah.gov' [dmcneill@utah.gov]; 'debbie@breatheutah.org' [debbie@breatheutah.org]; 'Djordan@newfield.com' [Djordan@newfield.com]; 'Eoman@altamontenergy.com' [Eoman@altamontenergy.com]; 'eehrmantraut@SLRconsulting.com' [eehrmantraut@SLRconsulting.com]; 'evernon@blm.gov' [evernon@blm.gov]; 'gtodd@duchesne.utah.gov' [gtodd@duchesne.utah.gov]; 'huy.tran@usu.edu' [huy.tran@usu.edu]; 'jpatterson@ndnlaw.com' [jpatterson@ndnlaw.com]; 'Jwoodall@newfield.com' [Jwoodall@newfield.com]; 'jwoodland@crescentpointenergy.com' [jwoodland@crescentpointenergy.com]; 'Jean.semborski@cop.com' [Jean.semborski@cop.com]; 'joe.sager@epenergy.com' [joe.sager@epenergy.com]; 'John.Spencer@simplot.com' [John.Spencer@simplot.com]; **Ex. 6 Personal Privacy (PP)**]; 'jmathis@tricountyhealth.com' [jmathis@tricountyhealth.com]; 'Jhirschi@enervest.net' [Jhirschi@enervest.net]; 'Karen_Pratt@xtoenergy.com' [Karen_Pratt@xtoenergy.com]; 'kburdick@Duchesne.utah.gov' [kburdick@Duchesne.utah.gov]; 'Lolsen@altamontenergy.com' [Lolsen@altamontenergy.com]; Lexie Wilson [lexiewilson@utah.gov]; 'lonnief@utetribe.com' [lonnief@utetribe.com]; Marie Bradshaw Durrant [MBDurrant@rqn.com]; 'mariek@utetribe.com' [mariek@utetribe.com]; 'marc.mansfield@usu.edu' [marc.mansfield@usu.edu]; mberger@utah.gov; 'mstewart@redleafinc.com' [mstewart@redleafinc.com]; Garvey, Megan [garvey.megan@epa.gov]; miken@utetribe.com; minnieg@utetribe.com; Morales, Monica [Morales.Monica@epa.gov]; 'rpage@ie-cos.com' [rpage@ie-cos.com]; 'rhrenko-browning@utahpetroleum.org' [rhrenko-browning@utahpetroleum.org]; 'Ryan.Clerico@enefit.com' [Ryan.Clerico@enefit.com]; 'Ryan@kairosaerospace.com' [Ryan@kairosaerospace.com]; 'Ryan.Swanson@epenergy.com' [Ryan.Swanson@epenergy.com]; 'scottchew@le.utah.gov' [scottchew@le.utah.gov]; Jackson, Scott [Jackson.Scott@epa.gov]; 'seth.lyman@usu.edu' [seth.lyman@usu.edu]; 'svance@utah.gov' [svance@utah.gov]; 'Spencer_Kimball@eogresources.com' [Spencer_Kimball@eogresources.com]; 'ssiffring@westernenergyalliance.org' [ssiffring@westernenergyalliance.org]; 'Thomas.H.Gibbons@andeavor.com' [Thomas.H.Gibbons@andeavor.com]; 'trang.tran@usu.edu' [trang.tran@usu.edu]; 'ttodd@utah.gov' [ttodd@utah.gov]; 'val.oman@epenergy.com' [val.oman@epenergy.com]; 'vince.christensen@simplot.com' [vince.christensen@simplot.com]; 'woswald@utah.gov' [woswald@utah.gov]; 'jmcqueen@crescentpointenergy.com' [jmcqueen@crescentpointenergy.com]; 'Andrea.Olsen@Simplot.com' [Andrea.Olsen@Simplot.com]; 'cpennell@utah.gov' [cpennell@utah.gov]; Nancy Daher [ndaher@utah.gov]; 'amatheson@utah.gov' [amatheson@utah.gov]; 'wesadams@utah.gov' [wesadams@utah.gov]

Subject: Uinta Basin Ozone Working Group Meeting
Location: Vernal, Salt Lake City, Denver

Start: 3/19/2019 8:00:00 PM
End: 3/19/2019 9:00:00 PM
Show Time As: Busy

Recurrence: (none)

Appointment

From: Doris Vanden Akker [dvandenakker@RQN.COM]
Sent: 9/28/2018 8:54:32 PM
To: Doris Vanden Akker [dvandenakker@RQN.COM]; 'aaverett@sunrise-eng.com' [aaverett@sunrise-eng.com]; 'Adrienne.Sandoval@andeavor.com' [Adrienne.Sandoval@andeavor.com]; 'amyc@utetribe.com' [amyc@utetribe.com]; 'Angela.Zivkovich@anadarko.com' [Angela.Zivkovich@anadarko.com]; 'ashley@publiclandsolutions.org' [ashley@publiclandsolutions.org]; 'bstringer@uintah.utah.gov' [bstringer@uintah.utah.gov]; 'Rhammer@SLRconsulting.com' [Rhammer@SLRconsulting.com]; 'Chad.Schlichtemeier@anadarko.com' [Chad.Schlichtemeier@anadarko.com]; 'chelsea.cantrelle@epenergy.com' [chelsea.cantrelle@epenergy.com]; Dresser, Chris [Dresser.Chris@epa.gov]; Beeler, Cindy [Beeler.Cindy@epa.gov]; Smith, Claudia [Smith.Claudia@epa.gov]; 'dbrown@tricountyhealth.com' [dbrown@tricountyhealth.com]; 'dmcneill@utah.gov' [dmcneill@utah.gov]; 'debbie@breatheutah.org' [debbie@breatheutah.org]; 'Djordan@newfield.com' [Djordan@newfield.com]; 'Eoman@altamontenergy.com' [Eoman@altamontenergy.com]; 'eehrmantraut@SLRconsulting.com' [eehrmantraut@SLRconsulting.com]; 'evernon@blm.gov' [evernon@blm.gov]; 'gtodd@duchesne.utah.gov' [gtodd@duchesne.utah.gov]; 'huy.tran@usu.edu' [huy.tran@usu.edu]; 'jpatterson@ndnlaw.com' [jpatterson@ndnlaw.com]; 'j.woodland@crescentpointenergy.com' [j.woodland@crescentpointenergy.com]; 'joe.sager@epenergy.com' [joe.sager@epenergy.com]; 'John.Spencer@simplot.com' [John.Spencer@simplot.com]; 'jmathis@tricountyhealth.com' [jmathis@tricountyhealth.com]; 'Jhirschi@enervest.net' [Jhirschi@enervest.net]; 'kburdick@Duchesne.utah.gov' [kburdick@Duchesne.utah.gov]; 'kvantassell@le.utah.gov' [kvantassell@le.utah.gov]; 'Lolsen@altamontenergy.com' [Lolsen@altamontenergy.com]; Lexie Wilson [lexiewilson@utah.gov]; 'lonnief@utetribe.com' [lonnief@utetribe.com]; Marie Durrant [MBDurrant@rqn.com]; 'mariek@utetribe.com' [mariek@utetribe.com]; 'marc.mansfield@usu.edu' [marc.mansfield@usu.edu]; mberger@utah.gov; 'mstewart@redleafinc.com' [mstewart@redleafinc.com]; Garvey, Megan [garvey.megan@epa.gov]; miken@utetribe.com; minnieg@utetribe.com; Morales, Monica [Morales.Monica@epa.gov]; 'rpage@ie-cos.com' [rpage@ie-cos.com]; 'rikki.hrenko@enefitamericanoil.com' [rikki.hrenko@enefitamericanoil.com]; 'Ryan.Clerico@enefit.com' [Ryan.Clerico@enefit.com]; 'scottchew@le.utah.gov' [scottchew@le.utah.gov]; 'seth.lyman@usu.edu' [seth.lyman@usu.edu]; 'svance@utah.gov' [svance@utah.gov]; 'Spencer_Kimball@eogresources.com' [Spencer_Kimball@eogresources.com]; 'ssiffring@westernenergyalliance.org' [ssiffring@westernenergyalliance.org]; 'Thomas.H.Gibbons@andeavor.com' [Thomas.H.Gibbons@andeavor.com]; 'trang.tran@usu.edu' [trang.tran@usu.edu]; 'ttodd@utah.gov' [ttodd@utah.gov]; 'val.oman@epenergy.com' [val.oman@epenergy.com]; 'vince.christensen@simplot.com' [vince.christensen@simplot.com]; 'woswald@utah.gov' [woswald@utah.gov]; Ex. 6 Personal Privacy (PP)

Subject: Canceled: 6. Jurisdictional alignment: Aligning regulations/credits/actions across jurisdictions/air sheds
Location: Uinta Basin Ozone Working Group

Start: 10/24/2018 7:00:00 PM
End: 10/24/2018 8:00:00 PM
Show Time As: Free

Importance: High

Recurrence: (none)

Appointment

From: Doris Vanden Akker [dvandenakker@RQN.COM]
Sent: 9/28/2018 8:53:48 PM
To: Doris Vanden Akker [dvandenakker@RQN.COM]; 'aaverett@sunrise-eng.com' [aaverett@sunrise-eng.com]; 'Adrienne.Sandoval@andeavor.com' [Adrienne.Sandoval@andeavor.com]; 'amyc@utetribe.com' [amyc@utetribe.com]; 'Angela.Zivkovich@anadarko.com' [Angela.Zivkovich@anadarko.com]; 'ashley@publiclandsolutions.org' [ashley@publiclandsolutions.org]; 'bstringer@uintah.utah.gov' [bstringer@uintah.utah.gov]; 'Rhammer@SLRconsulting.com' [Rhammer@SLRconsulting.com]; 'Chad.Schlichtemeier@anadarko.com' [Chad.Schlichtemeier@anadarko.com]; 'chelsea.cantrelle@epenergy.com' [chelsea.cantrelle@epenergy.com]; Dresser, Chris [Dresser.Chris@epa.gov]; Beeler, Cindy [Beeler.Cindy@epa.gov]; Smith, Claudia [Smith.Claudia@epa.gov]; 'dbrown@tricountyhealth.com' [dbrown@tricountyhealth.com]; 'dmcneill@utah.gov' [dmcneill@utah.gov]; 'debbie@breatheutah.org' [debbie@breatheutah.org]; 'Djordan@newfield.com' [Djordan@newfield.com]; 'Eoman@altamontenergy.com' [Eoman@altamontenergy.com]; 'eehrmantraut@SLRconsulting.com' [eehrmantraut@SLRconsulting.com]; 'evernon@blm.gov' [evernon@blm.gov]; 'gtodd@duchesne.utah.gov' [gtodd@duchesne.utah.gov]; 'huy.tran@usu.edu' [huy.tran@usu.edu]; 'jpatterson@ndnlaw.com' [jpatterson@ndnlaw.com]; 'j.woodland@crescentpointenergy.com' [j.woodland@crescentpointenergy.com]; 'joe.sager@epenergy.com' [joe.sager@epenergy.com]; 'John.Spencer@simplot.com' [John.Spencer@simplot.com]; 'jmathis@tricountyhealth.com' [jmathis@tricountyhealth.com]; 'Jhirschi@enervest.net' [Jhirschi@enervest.net]; 'kburdick@Duchesne.utah.gov' [kburdick@Duchesne.utah.gov]; 'kvantassell@le.utah.gov' [kvantassell@le.utah.gov]; 'Lolsen@altamontenergy.com' [Lolsen@altamontenergy.com]; Lexie Wilson [lexiewilson@utah.gov]; 'lonnief@utetribe.com' [lonnief@utetribe.com]; Marie Durrant [MBDurrant@rqn.com]; 'mariek@utetribe.com' [mariek@utetribe.com]; 'marc.mansfield@usu.edu' [marc.mansfield@usu.edu]; mberger@utah.gov; 'mstewart@redleafinc.com' [mstewart@redleafinc.com]; Garvey, Megan [garvey.megan@epa.gov]; miken@utetribe.com; minnieg@utetribe.com; Morales, Monica [Morales.Monica@epa.gov]; 'rpage@ie-cos.com' [rpage@ie-cos.com]; 'rikki.hrenko@enefitamericanoil.com' [rikki.hrenko@enefitamericanoil.com]; 'Ryan.Clerico@enefit.com' [Ryan.Clerico@enefit.com]; 'scottchew@le.utah.gov' [scottchew@le.utah.gov]; 'seth.lyman@usu.edu' [seth.lyman@usu.edu]; 'svance@utah.gov' [svance@utah.gov]; 'Spencer_Kimball@eogresources.com' [Spencer_Kimball@eogresources.com]; 'ssiffring@westernenergyalliance.org' [ssiffring@westernenergyalliance.org]; 'Thomas.H.Gibbons@andeavor.com' [Thomas.H.Gibbons@andeavor.com]; 'trang.tran@usu.edu' [trang.tran@usu.edu]; 'ttodd@utah.gov' [ttodd@utah.gov]; 'val.oman@epenergy.com' [val.oman@epenergy.com]; 'vince.christensen@simplot.com' [vince.christensen@simplot.com]; 'woswald@utah.gov' [woswald@utah.gov]; **Ex. 6 Personal Privacy (PP)**

Subject: Canceled: 5. Accounting for outside factors: Accounting for factors outside of traditional regulation
Location: Uinta Basin Ozone Working Group

Start: 10/24/2018 3:00:00 PM
End: 10/24/2018 4:00:00 PM
Show Time As: Free

Importance: High

Recurrence: (none)

Appointment

From: Doris Vanden Akker [dvandenakker@RQN.COM]
Sent: 9/28/2018 8:53:17 PM
To: Doris Vanden Akker [dvandenakker@RQN.COM]; 'aaverett@sunrise-eng.com' [aaverett@sunrise-eng.com]; 'Adrienne.Sandoval@andeavor.com' [Adrienne.Sandoval@andeavor.com]; 'amyc@utetribe.com' [amyc@utetribe.com]; 'Angela.Zivkovich@anadarko.com' [Angela.Zivkovich@anadarko.com]; 'ashley@publiclandsolutions.org' [ashley@publiclandsolutions.org]; 'bstringer@uintah.utah.gov' [bstringer@uintah.utah.gov]; 'Rhammer@SLRconsulting.com' [Rhammer@SLRconsulting.com]; 'Chad.Schlichtemeier@anadarko.com' [Chad.Schlichtemeier@anadarko.com]; 'chelsea.cantrelle@epenergy.com' [chelsea.cantrelle@epenergy.com]; Dresser, Chris [Dresser.Chris@epa.gov]; Beeler, Cindy [Beeler.Cindy@epa.gov]; Smith, Claudia [Smith.Claudia@epa.gov]; 'dbrown@tricountyhealth.com' [dbrown@tricountyhealth.com]; 'dmcneill@utah.gov' [dmcneill@utah.gov]; 'debbie@breatheutah.org' [debbie@breatheutah.org]; 'Djordan@newfield.com' [Djordan@newfield.com]; 'Eoman@altamontenergy.com' [Eoman@altamontenergy.com]; 'eehrmantraut@SLRconsulting.com' [eehrmantraut@SLRconsulting.com]; 'evernon@blm.gov' [evernon@blm.gov]; 'gtodd@duchesne.utah.gov' [gtodd@duchesne.utah.gov]; 'huy.tran@usu.edu' [huy.tran@usu.edu]; 'jpatterson@ndnlaw.com' [jpatterson@ndnlaw.com]; 'j.woodland@crescentpointenergy.com' [j.woodland@crescentpointenergy.com]; 'joe.sager@epenergy.com' [joe.sager@epenergy.com]; 'John.Spencer@simplot.com' [John.Spencer@simplot.com]; 'jmathis@tricountyhealth.com' [jmathis@tricountyhealth.com]; 'Jhirschi@enervest.net' [Jhirschi@enervest.net]; 'kburdick@Duchesne.utah.gov' [kburdick@Duchesne.utah.gov]; 'kvantassell@le.utah.gov' [kvantassell@le.utah.gov]; 'Lolsen@altamontenergy.com' [Lolsen@altamontenergy.com]; Lexie Wilson [lexiewilson@utah.gov]; 'lonnief@utetribe.com' [lonnief@utetribe.com]; Marie Durrant [MBDurrant@rqn.com]; 'mariek@utetribe.com' [mariek@utetribe.com]; 'marc.mansfield@usu.edu' [marc.mansfield@usu.edu]; mberger@utah.gov; 'mstewart@redleafinc.com' [mstewart@redleafinc.com]; Garvey, Megan [garvey.megan@epa.gov]; miken@utetribe.com; minnieg@utetribe.com; Morales, Monica [Morales.Monica@epa.gov]; 'rpage@ie-cos.com' [rpage@ie-cos.com]; 'rikki.hrenko@enefitamericanoil.com' [rikki.hrenko@enefitamericanoil.com]; 'Ryan.Clerico@enefit.com' [Ryan.Clerico@enefit.com]; 'scottchew@le.utah.gov' [scottchew@le.utah.gov]; 'seth.lyman@usu.edu' [seth.lyman@usu.edu]; 'svance@utah.gov' [svance@utah.gov]; 'Spencer_Kimball@eogresources.com' [Spencer_Kimball@eogresources.com]; 'ssiffring@westernenergyalliance.org' [ssiffring@westernenergyalliance.org]; 'Thomas.H.Gibbons@andeavor.com' [Thomas.H.Gibbons@andeavor.com]; 'trang.tran@usu.edu' [trang.tran@usu.edu]; 'ttodd@utah.gov' [ttodd@utah.gov]; 'val.oman@epenergy.com' [val.oman@epenergy.com]; 'vince.christensen@simplot.com' [vince.christensen@simplot.com]; 'woswald@utah.gov' [woswald@utah.gov]; Ex. 6 Personal Privacy (PP)

Subject: Canceled: 4. Most effective reduction targets: Identifying most effective emission reduction targets and measures
Location: Uinta Basin Ozone Working Group

Start: 10/24/2018 4:30:00 PM
End: 10/24/2018 5:00:00 PM
Show Time As: Free

Importance: High

Recurrence: (none)

Appointment

From: Doris Vanden Akker [dvandenakker@RQN.COM]
Sent: 9/28/2018 8:51:25 PM
To: Doris Vanden Akker [dvandenakker@RQN.COM]; 'aaverett@sunrise-eng.com' [aaverett@sunrise-eng.com]; 'Adrienne.Sandoval@andeavor.com' [Adrienne.Sandoval@andeavor.com]; 'amyc@utetribe.com' [amyc@utetribe.com]; 'Angela.Zivkovich@anadarko.com' [Angela.Zivkovich@anadarko.com]; 'ashley@publiclandsolutions.org' [ashley@publiclandsolutions.org]; 'bstringer@uintah.utah.gov' [bstringer@uintah.utah.gov]; 'Rhammer@SLRconsulting.com' [Rhammer@SLRconsulting.com]; 'Chad.Schlichtemeier@anadarko.com' [Chad.Schlichtemeier@anadarko.com]; 'chelsea.cantrelle@epenergy.com' [chelsea.cantrelle@epenergy.com]; Dresser, Chris [Dresser.Chris@epa.gov]; Beeler, Cindy [Beeler.Cindy@epa.gov]; Smith, Claudia [Smith.Claudia@epa.gov]; 'dbrown@tricountyhealth.com' [dbrown@tricountyhealth.com]; 'dmcneill@utah.gov' [dmcneill@utah.gov]; 'debbie@breatheutah.org' [debbie@breatheutah.org]; 'Djordan@newfield.com' [Djordan@newfield.com]; 'Eoman@altamontenergy.com' [Eoman@altamontenergy.com]; 'eehrmantraut@SLRconsulting.com' [eehrmantraut@SLRconsulting.com]; 'evernon@blm.gov' [evernon@blm.gov]; 'gtodd@duchesne.utah.gov' [gtodd@duchesne.utah.gov]; 'huy.tran@usu.edu' [huy.tran@usu.edu]; 'jpatterson@ndnlaw.com' [jpatterson@ndnlaw.com]; 'j.woodland@crescentpointenergy.com' [j.woodland@crescentpointenergy.com]; 'joe.sager@epenergy.com' [joe.sager@epenergy.com]; 'John.Spencer@simplot.com' [John.Spencer@simplot.com]; 'jmathis@tricountyhealth.com' [jmathis@tricountyhealth.com]; 'Jhirschi@enervest.net' [Jhirschi@enervest.net]; 'kburdick@Duchesne.utah.gov' [kburdick@Duchesne.utah.gov]; 'kvantassell@le.utah.gov' [kvantassell@le.utah.gov]; 'Lolsen@altamontenergy.com' [Lolsen@altamontenergy.com]; Lexie Wilson [lexiewilson@utah.gov]; 'lonnief@utetribe.com' [lonnief@utetribe.com]; Marie Durrant [MBDurrant@rqn.com]; 'mariek@utetribe.com' [mariek@utetribe.com]; 'marc.mansfield@usu.edu' [marc.mansfield@usu.edu]; mberger@utah.gov; 'mstewart@redleafinc.com' [mstewart@redleafinc.com]; Garvey, Megan [garvey.megan@epa.gov]; miken@utetribe.com; minnieg@utetribe.com; Morales, Monica [Morales.Monica@epa.gov]; 'rpage@ie-cos.com' [rpage@ie-cos.com]; 'rikki.hrenko@enefitamericanoil.com' [rikki.hrenko@enefitamericanoil.com]; 'Ryan.Clerico@enefit.com' [Ryan.Clerico@enefit.com]; 'scottchew@le.utah.gov' [scottchew@le.utah.gov]; 'seth.lyman@usu.edu' [seth.lyman@usu.edu]; 'svance@utah.gov' [svance@utah.gov]; 'Spencer_Kimball@eogresources.com' [Spencer_Kimball@eogresources.com]; 'ssiffring@westernenergyalliance.org' [ssiffring@westernenergyalliance.org]; 'Thomas.H.Gibbons@andeavor.com' [Thomas.H.Gibbons@andeavor.com]; 'trang.tran@usu.edu' [trang.tran@usu.edu]; 'ttodd@utah.gov' [ttodd@utah.gov]; 'val.oman@epenergy.com' [val.oman@epenergy.com]; 'vince.christensen@simplot.com' [vince.christensen@simplot.com]; 'woswald@utah.gov' [woswald@utah.gov]; **Ex. 6 Personal Privacy (PP)**

Subject: Canceled: 3. Helpful comparisons: Comparison with other nonattainment areas – successes and things that didn't work
Location: Uinta Basin Ozone Working Group

Start: 10/24/2018 4:00:00 PM
End: 10/24/2018 5:00:00 PM
Show Time As: Free

Importance: High

Recurrence: (none)

Appointment

From: Doris Vanden Akker [dvandenakker@RQN.COM]
Sent: 9/28/2018 8:50:22 PM
To: Doris Vanden Akker [dvandenakker@RQN.COM]; 'aaverett@sunrise-eng.com' [aaverett@sunrise-eng.com]; 'Adrienne.Sandoval@andeavor.com' [Adrienne.Sandoval@andeavor.com]; 'amyc@utetribe.com' [amyc@utetribe.com]; 'Angela.Zivkovich@anadarko.com' [Angela.Zivkovich@anadarko.com]; 'ashley@publiclandsolutions.org' [ashley@publiclandsolutions.org]; 'bstringer@uintah.utah.gov' [bstringer@uintah.utah.gov]; 'Rhammer@SLRconsulting.com' [Rhammer@SLRconsulting.com]; 'Chad.Schlichtemeier@anadarko.com' [Chad.Schlichtemeier@anadarko.com]; 'chelsea.cantrelle@epenergy.com' [chelsea.cantrelle@epenergy.com]; Dresser, Chris [Dresser.Chris@epa.gov]; Beeler, Cindy [Beeler.Cindy@epa.gov]; Smith, Claudia [Smith.Claudia@epa.gov]; 'dbrown@tricountyhealth.com' [dbrown@tricountyhealth.com]; 'dmcneill@utah.gov' [dmcneill@utah.gov]; 'debbie@breatheutah.org' [debbie@breatheutah.org]; 'Djordan@newfield.com' [Djordan@newfield.com]; 'Eoman@altamontenergy.com' [Eoman@altamontenergy.com]; 'eehrmantraut@SLRconsulting.com' [eehrmantraut@SLRconsulting.com]; 'evernon@blm.gov' [evernon@blm.gov]; 'gtodd@duchesne.utah.gov' [gtodd@duchesne.utah.gov]; 'huy.tran@usu.edu' [huy.tran@usu.edu]; 'jpatterson@ndnlaw.com' [jpatterson@ndnlaw.com]; 'j.woodland@crescentpointenergy.com' [j.woodland@crescentpointenergy.com]; 'joe.sager@epenergy.com' [joe.sager@epenergy.com]; 'John.Spencer@simplot.com' [John.Spencer@simplot.com]; 'jmathis@tricountyhealth.com' [jmathis@tricountyhealth.com]; 'Jhirschi@enervest.net' [Jhirschi@enervest.net]; 'kburdick@Duchesne.utah.gov' [kburdick@Duchesne.utah.gov]; 'kvantassell@le.utah.gov' [kvantassell@le.utah.gov]; 'Lolsen@altamontenergy.com' [Lolsen@altamontenergy.com]; Lexie Wilson [lexiewilson@utah.gov]; 'lonnief@utetribe.com' [lonnief@utetribe.com]; Marie Durrant [MBDurrant@rqn.com]; 'mariek@utetribe.com' [mariek@utetribe.com]; 'marc.mansfield@usu.edu' [marc.mansfield@usu.edu]; mberger@utah.gov; 'mstewart@redleafinc.com' [mstewart@redleafinc.com]; Garvey, Megan [garvey.megan@epa.gov]; miken@utetribe.com; minnieg@utetribe.com; Morales, Monica [Morales.Monica@epa.gov]; 'rpage@ie-cos.com' [rpage@ie-cos.com]; 'rikki.hrenko@enefitamericanoil.com' [rikki.hrenko@enefitamericanoil.com]; 'Ryan.Clerico@enefit.com' [Ryan.Clerico@enefit.com]; 'scottchew@le.utah.gov' [scottchew@le.utah.gov]; 'seth.lyman@usu.edu' [seth.lyman@usu.edu]; 'svance@utah.gov' [svance@utah.gov]; 'Spencer_Kimball@eogresources.com' [Spencer_Kimball@eogresources.com]; 'ssiffring@westernenergyalliance.org' [ssiffring@westernenergyalliance.org]; 'Thomas.H.Gibbons@andeavor.com' [Thomas.H.Gibbons@andeavor.com]; 'trang.tran@usu.edu' [trang.tran@usu.edu]; 'ttodd@utah.gov' [ttodd@utah.gov]; 'val.oman@epenergy.com' [val.oman@epenergy.com]; 'vince.christensen@simplot.com' [vince.christensen@simplot.com]; 'woswald@utah.gov' [woswald@utah.gov]; Ex. 6 Personal Privacy (PP)

Subject: Canceled: 2. Crediting voluntary reductions: Credit for voluntary/proactive emission reductions
Location: Uinta Basin Ozone Working Group

Start: 10/24/2018 5:00:00 PM
End: 10/24/2018 5:30:00 PM
Show Time As: Free

Importance: High

Recurrence: (none)

Appointment

From: Marie Bradshaw Durrant [MBDurrant@rqn.com]
Sent: 5/15/2019 11:31:15 PM
To: Marie Bradshaw Durrant [MBDurrant@rqn.com]; 'aaverett@sunrise-eng.com' [aaverett@sunrise-eng.com]; 'Adrienne.Sandoval@andeavor.com' [Adrienne.Sandoval@andeavor.com]; 'amyc@utetribe.com' [amyc@utetribe.com]; 'Angela.Zivkovich@anadarko.com' [Angela.Zivkovich@anadarko.com]; 'ashley@publiclandsolutions.org' [ashley@publiclandsolutions.org]; 'bstringer@uintah.utah.gov' [bstringer@uintah.utah.gov]; 'Rhammer@SLRconsulting.com' [Rhammer@SLRconsulting.com]; 'bmensinger@trinityconsultants.com' [bmensinger@trinityconsultants.com]; 'Chad.Schlichtemeier@anadarko.com' [Chad.Schlichtemeier@anadarko.com]; 'chelsea.cantrelle@epenergy.com' [chelsea.cantrelle@epenergy.com]; 'CColclasure@bwenergylaw.com' [CColclasure@bwenergylaw.com]; Dresser, Chris [Dresser.Chris@epa.gov]; Beeler, Cindy [Beeler.Cindy@epa.gov]; Smith, Claudia [Smith.Claudia@epa.gov]; Bean, Clayton [bean.clayton@epa.gov]; 'corey.jones@epenergy.com' [corey.jones@epenergy.com]; 'Daniel.D.Pring@andeavor.com' [Daniel.D.Pring@andeavor.com]; 'dbrown@tricountyhealth.com' [dbrown@tricountyhealth.com]; 'dmcneill@utah.gov' [dmcneill@utah.gov]; 'debbie@breatheutah.org' [debbie@breatheutah.org]; 'Douglas.Jordan@encana.com' [Douglas.Jordan@encana.com]; 'Eoman@altamontenergy.com' [Eoman@altamontenergy.com]; 'eehrmantraut@SLRconsulting.com' [eehrmantraut@SLRconsulting.com]; 'evernon@blm.gov' [evernon@blm.gov]; 'gtodd@duchesne.utah.gov' [gtodd@duchesne.utah.gov]; 'huy.tran@usu.edu' [huy.tran@usu.edu]; 'jpatterson@ndnlaw.com' [jpatterson@ndnlaw.com]; 'James.woodall@encana.com' [James.woodall@encana.com]; 'jwoodland@crescentpointenergy.com' [jwoodland@crescentpointenergy.com]; 'Jean.semborski@cop.com' [Jean.semborski@cop.com]; 'joe.sager@epenergy.com' [joe.sager@epenergy.com]; 'John.Spencer@simplot.com' [John.Spencer@simplot.com]; Ex. 6 Personal Privacy (PP)]; 'jmathis@tricountyhealth.com' [jmathis@tricountyhealth.com]; 'Jhirschi@enervest.net' [Jhirschi@enervest.net]; 'Karen_Pratt@xtoenergy.com' [Karen_Pratt@xtoenergy.com]; 'kburdick@Duchesne.utah.gov' [kburdick@Duchesne.utah.gov]; 'Lolsen@altamontenergy.com' [Lolsen@altamontenergy.com]; Lexie Wilson [lexiewilson@utah.gov]; 'lonnief@utetribe.com' [lonnief@utetribe.com]; 'mariek@utetribe.com' [mariek@utetribe.com]; 'marc.mansfield@usu.edu' [marc.mansfield@usu.edu]; mberger@utah.gov; 'mstewart@redleafinc.com' [mstewart@redleafinc.com]; Garvey, Megan [garvey.megan@epa.gov]; miken@utetribe.com; minnieg@utetribe.com; Morales, Monica [Morales.Monica@epa.gov]; 'rpage@ie-cos.com' [rpage@ie-cos.com]; 'rhrenko-browning@utahpetroleum.org' [rhrenko-browning@utahpetroleum.org]; 'Ryan.Clerico@enefit.com' [Ryan.Clerico@enefit.com]; 'Ryan@kairosaerospace.com' [Ryan@kairosaerospace.com]; 'Ryan.Swanson@epenergy.com' [Ryan.Swanson@epenergy.com]; 'scottchew@le.utah.gov' [scottchew@le.utah.gov]; Jackson, Scott [Jackson.Scott@epa.gov]; 'seth.lyman@usu.edu' [seth.lyman@usu.edu]; 'svance@utah.gov' [svance@utah.gov]; 'Spencer_Kimball@eogresources.com' [Spencer_Kimball@eogresources.com]; 'ssiffring@westernenergyalliance.org' [ssiffring@westernenergyalliance.org]; 'Thomas.H.Gibbons@andeavor.com' [Thomas.H.Gibbons@andeavor.com]; 'trang.tran@usu.edu' [trang.tran@usu.edu]; 'ttodd@utah.gov' [ttodd@utah.gov]; 'val.oman@epenergy.com' [val.oman@epenergy.com]; 'vince.christensen@simplot.com' [vince.christensen@simplot.com]; 'jmcqueen@crescentpointenergy.com' [jmcqueen@crescentpointenergy.com]; 'Andrea.Olsen@Simplot.com' [Andrea.Olsen@Simplot.com]; 'cpennell@utah.gov' [cpennell@utah.gov]; Nancy Daher [ndaher@utah.gov]; 'amatheson@utah.gov' [amatheson@utah.gov]; 'wesadams@utah.gov' [wesadams@utah.gov]; 'twiseman@utah.gov' [twiseman@utah.gov]; 'randy.hughes@middleforkep.com' [randy.hughes@middleforkep.com]; 'rob.zaback@middleforkep.com' [rob.zaback@middleforkep.com]

Subject: Uinta Basin Ozone Working Group Meeting
Location: Vernal, Salt Lake City, Denver

Start: 6/12/2019 8:00:00 PM
End: 6/12/2019 9:00:00 PM
Show Time As: Tentative

Recurrence: (none)

Appointment

From: Marie Bradshaw Durrant [MBDurrant@rqn.com]
Sent: 3/19/2019 10:40:14 PM
To: Marie Bradshaw Durrant [MBDurrant@rqn.com]; 'svance@utah.gov' [svance@utah.gov]; 'corey.jones@epenergy.com' [corey.jones@epenergy.com]; 'Rhammer@SLRconsulting.com' [Rhammer@SLRconsulting.com]; Nancy Daher [ndaher@utah.gov]; 'huy.tran@usu.edu' [huy.tran@usu.edu]; 'twiseman@utah.gov' [twiseman@utah.gov]; 'James.woodall@encana.com' [James.woodall@encana.com]; 'vince.christensen@simplot.com' [vince.christensen@simplot.com]; 'ttodd@utah.gov' [ttodd@utah.gov]; Beeler, Cindy [Beeler.Cindy@epa.gov]; 'gtodd@duchesne.utah.gov' [gtodd@duchesne.utah.gov]; 'amyc@utetribe.com' [amyc@utetribe.com]; 'Ryan.Swanson@epenergy.com' [Ryan.Swanson@epenergy.com]; 'debbie@breatheutah.org' [debbie@breatheutah.org]; miken@utetribe.com; 'CColclasure@bwenergylaw.com' [CColclasure@bwenergylaw.com]; 'rhrenko-browning@utahpetroleum.org' [rhrenko-browning@utahpetroleum.org]; Bean, Clayton [bean.clayton@epa.gov]; mberger@utah.gov; 'aaverett@sunrise-eng.com' [aaverett@sunrise-eng.com]; 'Ryan@kairosaerospace.com' [Ryan@kairosaerospace.com]; 'lonnief@utetribe.com' [lonnief@utetribe.com]; **Ex. 6 Personal Privacy (PP)** 'Djordan@newfield.com' [Djordan@newfield.com]; Dresser, Chris [Dresser.Chris@epa.gov]; 'jpatterson@ndnlaw.com' [jpatterson@ndnlaw.com]; 'Jhirschi@enervest.net' [Jhirschi@enervest.net]; 'chelsea.cantrelle@epenergy.com' [chelsea.cantrelle@epenergy.com]; Morales, Monica [Morales.Monica@epa.gov]; 'Chad.Schlichtemeier@anadarko.com' [Chad.Schlichtemeier@anadarko.com]; 'Adrienne.Sandoval@andeavor.com' [Adrienne.Sandoval@andeavor.com]; 'kburdick@Duchesne.utah.gov' [kburdick@Duchesne.utah.gov]; 'joe.sager@epenergy.com' [joe.sager@epenergy.com]; 'ssiffring@westernenergyalliance.org' [ssiffring@westernenergyalliance.org]; 'Karen_Pratt@xtoenergy.com' [Karen_Pratt@xtoenergy.com]; 'mariek@utetribe.com' [mariek@utetribe.com]; 'jmathis@tricountyhealth.com' [jmathis@tricountyhealth.com]; 'marc.mansfield@usu.edu' [marc.mansfield@usu.edu]; 'Lolsen@altamontenergy.com' [Lolsen@altamontenergy.com]; 'jmcqueen@crescentpointenergy.com' [jmcqueen@crescentpointenergy.com]; 'John.Spencer@simplot.com' [John.Spencer@simplot.com]; Lexie Wilson [lexiewilson@utah.gov]; 'evernon@blm.gov' [evernon@blm.gov]; Smith, Claudia [Smith.Claudia@epa.gov]; 'eehrmantraut@SLRconsulting.com' [eehrmantraut@SLRconsulting.com]; 'wesadams@utah.gov' [wesadams@utah.gov]; 'amatheson@utah.gov' [amatheson@utah.gov]; 'Angela.Zivkovich@anadarko.com' [Angela.Zivkovich@anadarko.com]; 'Spencer_Kimball@eogresources.com' [Spencer_Kimball@eogresources.com]; 'ashley@publiclandsolutions.org' [ashley@publiclandsolutions.org]; 'dbrown@tricountyhealth.com' [dbrown@tricountyhealth.com]; Jackson, Scott [Jackson.Scott@epa.gov]; 'scottchew@le.utah.gov' [scottchew@le.utah.gov]; Garvey, Megan [garvey.megan@epa.gov]; 'Daniel.D.Pring@andeavor.com' [Daniel.D.Pring@andeavor.com]; 'seth.lyman@usu.edu' [seth.lyman@usu.edu]; minnieg@utetribe.com; 'cpennell@utah.gov' [cpennell@utah.gov]; 'woswald@utah.gov' [woswald@utah.gov]; 'bstringer@uintah.utah.gov' [bstringer@uintah.utah.gov]; 'bmensinger@trinityconsultants.com' [bmensinger@trinityconsultants.com]; 'jwoodland@crescentpointenergy.com' [jwoodland@crescentpointenergy.com]; 'Ryan.Clerico@enefit.com' [Ryan.Clerico@enefit.com]; 'mstewart@redleafinc.com' [mstewart@redleafinc.com]; 'Jean.semborski@cop.com' [Jean.semborski@cop.com]; 'trang.tran@usu.edu' [trang.tran@usu.edu]; 'val.oman@epenergy.com' [val.oman@epenergy.com]; 'rpage@ie-cos.com' [rpage@ie-cos.com]; 'Thomas.H.Gibbons@andeavor.com' [Thomas.H.Gibbons@andeavor.com]; 'dmcneill@utah.gov' [dmcneill@utah.gov]; 'Andrea.Olsen@Simplot.com' [Andrea.Olsen@Simplot.com]; 'Eoman@altamontenergy.com' [Eoman@altamontenergy.com]
CC: Tonnesen, Gail [Tonnesen.Gail@epa.gov]; 'irene@uintabasin.org' [irene@uintabasin.org]; 'Douglas.Jordan@encana.com' [Douglas.Jordan@encana.com]

Subject: Uinta Basin Ozone Working Group Meeting - agenda and video/call-in information
Attachments: 2019 0411 Uinta Basin Ozone Working Group Meeting Agenda.docx
Location: Crossroads Community Center 50 E 200 S, Roosevelt, UT 84066

Start: 4/11/2019 8:30:00 PM
End: 4/11/2019 10:30:00 PM
Show Time As: Tentative

Recurrence: (none)

Please see the attached agenda for the April 11 OBOWG meeting.

Call-in and video conferencing information:

RQN is inviting you to a scheduled Zoom meeting.

Topic: April 2019 Uinta Basin Ozone Working Group Meeting
Time: Apr 11, 2019 2:15 PM Mountain Time (US and Canada)

Join Zoom Meeting
https://zoom.us/j/849322326

One tap mobile
Ex. 6 Personal Privacy (PP) # US (New York)
US

Dial by your location
+1 Ex. 6 Personal Privacy (PP) (New York)
+1
Meetin
Find your local number: https://zoom.us/u/acWfpJi35E

This meeting will be between events for the Utah Division of Oil Gas and Mining Hydrocarbon Conference Ex. 6 Personal Privacy (PP) and the Utah Petroleum Association roundtable and community outreach dinner.

If you plan to attend the Utah Petroleum Association dinner, please sign up at the following link: https://utahpetroleum.org/ub-community-outreach/.

Uinta Basin Ozone Working Group Meeting
April 11, 2019 – Crossroads Community Center, Roosevelt

1. Industry voluntary measures during 2018-19 winter ozone season – Tri-County Health Award

2. Presentation on past winter and design value for the Basin (DAQ);

3. Discussion about NOx and VOC contributions to high ozone events in the Basin (EPA, USU)

4. Update on U&O FIP, National Oil and Natural Gas FIP, and emissions reduction credit banking rulemakings (EPA)

5. Report on modeling workshop (USU/Western Energy Alliance)

6. Emissions Inventory (DAQ)

7. Plans and active measures needed to prepare for next winter
    a. Actions/systems needing work/development over the summer
    b. September/October stakeholder meeting

Appointment

From: Doris Vanden Akker [dvandenakker@RQN.COM]
Sent: 2/13/2019 10:39:51 PM
To: Doris Vanden Akker [dvandenakker@RQN.COM]; 'aaverett@sunrise-eng.com' [aaverett@sunrise-eng.com]; 'Adrienne.Sandoval@andeavor.com' [Adrienne.Sandoval@andeavor.com]; 'amyc@utetribe.com' [amyc@utetribe.com]; 'Angela.Zivkovich@anadarko.com' [Angela.Zivkovich@anadarko.com]; 'ashley@publiclandsolutions.org' [ashley@publiclandsolutions.org]; 'bstringer@uintah.utah.gov' [bstringer@uintah.utah.gov]; 'Rhammer@SLRconsulting.com' [Rhammer@SLRconsulting.com]; 'bmensinger@trinityconsultants.com' [bmensinger@trinityconsultants.com]; 'Chad.Schlichtemeier@anadarko.com' [Chad.Schlichtemeier@anadarko.com]; 'chelsea.cantrelle@epenergy.com' [chelsea.cantrelle@epenergy.com]; 'CColclasure@bwenergylaw.com' [CColclasure@bwenergylaw.com]; Dresser, Chris [Dresser.Chris@epa.gov]; Beeler, Cindy [Beeler.Cindy@epa.gov]; Smith, Claudia [Smith.Claudia@epa.gov]; Bean, Clayton [bean.clayton@epa.gov]; 'corey.jones@epenergy.com' [corey.jones@epenergy.com]; 'Daniel.D.Pring@andeavor.com' [Daniel.D.Pring@andeavor.com]; 'dbrown@tricountyhealth.com' [dbrown@tricountyhealth.com]; 'dmcneill@utah.gov' [dmcneill@utah.gov]; 'debbie@breatheutah.org' [debbie@breatheutah.org]; 'Djordan@newfield.com' [Djordan@newfield.com]; 'Eoman@altamontenergy.com' [Eoman@altamontenergy.com]; 'eehrmantraut@SLRconsulting.com' [eehrmantraut@SLRconsulting.com]; 'evernon@blm.gov' [evernon@blm.gov]; 'gtodd@duchesne.utah.gov' [gtodd@duchesne.utah.gov]; 'huy.tran@usu.edu' [huy.tran@usu.edu]; 'jpatterson@ndnlaw.com' [jpatterson@ndnlaw.com]; 'Jwoodall@newfield.com' [Jwoodall@newfield.com]; 'jwoodland@crescentpointenergy.com' [jwoodland@crescentpointenergy.com]; 'Jean.semborski@cop.com' [Jean.semborski@cop.com]; 'joe.sager@epenergy.com' [joe.sager@epenergy.com]; 'John.Spencer@simplot.com' [John.Spencer@simplot.com]; Ex. 6 Personal Privacy (PP); 'jmathis@tricountyhealth.com' [jmathis@tricountyhealth.com]; 'Jhirschi@enervest.net' [Jhirschi@enervest.net]; 'Karen_Pratt@xtoenergy.com' [Karen_Pratt@xtoenergy.com]; 'kburdick@Duchesne.utah.gov' [kburdick@Duchesne.utah.gov]; 'Lolsen@altamontenergy.com' [Lolsen@altamontenergy.com]; Lexie Wilson [lexiewilson@utah.gov]; 'lonnief@utetribe.com' [lonnief@utetribe.com]; Marie Bradshaw Durrant [MBDurrant@rqn.com]; 'mariek@utetribe.com' [mariek@utetribe.com]; 'marc.mansfield@usu.edu' [marc.mansfield@usu.edu]; mberger@utah.gov; 'mstewart@redleafinc.com' [mstewart@redleafinc.com]; Garvey, Megan [garvey.megan@epa.gov]; miken@utetribe.com; minnieg@utetribe.com; Morales, Monica [Morales.Monica@epa.gov]; 'rpage@ie-cos.com' [rpage@ie-cos.com]; 'rhrenko-browning@utahpetroleum.org' [rhrenko-browning@utahpetroleum.org]; 'Ryan.Clerico@enefit.com' [Ryan.Clerico@enefit.com]; 'Ryan@kairosaerospace.com' [Ryan@kairosaerospace.com]; 'Ryan.Swanson@epenergy.com' [Ryan.Swanson@epenergy.com]; 'scottchew@le.utah.gov' [scottchew@le.utah.gov]; Jackson, Scott [Jackson.Scott@epa.gov]; 'seth.lyman@usu.edu' [seth.lyman@usu.edu]; 'svance@utah.gov' [svance@utah.gov]; 'Spencer_Kimball@eogresources.com' [Spencer_Kimball@eogresources.com]; 'ssiffring@westernenergyalliance.org' [ssiffring@westernenergyalliance.org]; 'Thomas.H.Gibbons@andeavor.com' [Thomas.H.Gibbons@andeavor.com]; 'trang.tran@usu.edu' [trang.tran@usu.edu]; 'ttodd@utah.gov' [ttodd@utah.gov]; 'val.oman@epenergy.com' [val.oman@epenergy.com]; 'vince.christensen@simplot.com' [vince.christensen@simplot.com]; 'woswald@utah.gov' [woswald@utah.gov]; 'jmcqueen@crescentpointenergy.com' [jmcqueen@crescentpointenergy.com]; 'Andrea.Olsen@Simplot.com' [Andrea.Olsen@Simplot.com]; 'cpennell@utah.gov' [cpennell@utah.gov]; Nancy Daher [ndaher@utah.gov]; 'amatheson@utah.gov' [amatheson@utah.gov]; 'wesadams@utah.gov' [wesadams@utah.gov]

Subject: Uinta Basin Ozone Working Group Meeting
Location: Vernal, Salt Lake City, Denver

Start: 3/19/2019 8:00:00 PM
End: 3/19/2019 9:00:00 PM
Show Time As: Busy

Recurrence: (none)

Video Conferencing Locations:

- **Vernal** – USU campus in Vernal (320 N. Aggie Blvd.) in Room 101. Come through the main entrance, and it is the first door on your left.
- **Salt Lake City** – Ray Quinney & Nebeker, 36 South State Street, Suite 1400 (parking available in City Creek parking structure)
- **Denver** – Western Energy Alliance, 1775 Sherman St., Suite 2700 (ask for Stuart Siffring)

Call in information:

Dial by your location
+1 Ex. 6 Personal Privacy (PP) US (New York)
+1 Ex. 6 Personal Privacy (PP) US
Meeting ID: Ex. 6 Personal Privacy (PP)
Find your local number: https://zoom.us/u/acWfpJi35E

Uinta Basin Ozone Working Group Meeting
March 19, 2019

1. Report on recent exceedances
2. Impacts from exceedances

a. Design value calculation
b. Implications for designation and timing
c. Is there a role for UBOWG in updating the public?

3. Getting processes in place for industry voluntary measures and preparing for next winter
4. April in-person meeting

Appointment

From: Marie Bradshaw Durrant [MBDurrant@rqn.com]
Sent: 1/9/2019 4:20:40 PM
To: Marie Bradshaw Durrant [MBDurrant@rqn.com]; 'aaverett@sunrise-eng.com' [aaverett@sunrise-eng.com]; 'Adrienne.Sandoval@andeavor.com' [Adrienne.Sandoval@andeavor.com]; 'amyc@utetribe.com' [amyc@utetribe.com]; 'Angela.Zivkovich@anadarko.com' [Angela.Zivkovich@anadarko.com]; 'ashley@publiclandsolutions.org' [ashley@publiclandsolutions.org]; 'bstringer@uintah.utah.gov' [bstringer@uintah.utah.gov]; 'Rhammer@SLRconsulting.com' [Rhammer@SLRconsulting.com]; 'bmensinger@trinityconsultants.com' [bmensinger@trinityconsultants.com]; 'Chad.Schlichtemeier@anadarko.com' [Chad.Schlichtemeier@anadarko.com]; 'chelsea.cantrelle@epenergy.com' [chelsea.cantrelle@epenergy.com]; 'CColclasure@bwenergylaw.com' [CColclasure@bwenergylaw.com]; Dresser, Chris [Dresser.Chris@epa.gov]; Beeler, Cindy [Beeler.Cindy@epa.gov]; Smith, Claudia [Smith.Claudia@epa.gov]; Bean, Clayton [bean.clayton@epa.gov]; 'corey.jones@epenergy.com' [corey.jones@epenergy.com]; 'Daniel.D.Pring@andeavor.com' [Daniel.D.Pring@andeavor.com]; 'dbrown@tricountyhealth.com' [dbrown@tricountyhealth.com]; 'dmcneill@utah.gov' [dmcneill@utah.gov]; 'debbie@breatheutah.org' [debbie@breatheutah.org]; 'Djordan@newfield.com' [Djordan@newfield.com]; 'Eoman@altamontenergy.com' [Eoman@altamontenergy.com]; 'eehrmantraut@SLRconsulting.com' [eehrmantraut@SLRconsulting.com]; 'evernon@blm.gov' [evernon@blm.gov]; 'gtodd@duchesne.utah.gov' [gtodd@duchesne.utah.gov]; 'huy.tran@usu.edu' [huy.tran@usu.edu]; 'jpatterson@ndnlaw.com' [jpatterson@ndnlaw.com]; 'Jwoodall@newfield.com' [Jwoodall@newfield.com]; 'jwoodland@crescentpointenergy.com' [jwoodland@crescentpointenergy.com]; 'Jean.semborski@cop.com' [Jean.semborski@cop.com]; 'joe.sager@epenergy.com' [joe.sager@epenergy.com]; 'John.Spencer@simplot.com' [John.Spencer@simplot.com]; **Ex. 6 Personal Privacy (PP)**; 'jmathis@tricountyhealth.com' [jmathis@tricountyhealth.com]; 'Jhirschi@enervest.net' [Jhirschi@enervest.net]; 'Karen_Pratt@xtoenergy.com' [Karen_Pratt@xtoenergy.com]; 'kburdick@Duchesne.utah.gov' [kburdick@Duchesne.utah.gov]; 'kvantassell@le.utah.gov' [kvantassell@le.utah.gov]; 'Lolsen@altamontenergy.com' [Lolsen@altamontenergy.com]; Lexie Wilson [lexiewilson@utah.gov]; 'lonnief@utetribe.com' [lonnief@utetribe.com]; 'mariek@utetribe.com' [mariek@utetribe.com]; 'marc.mansfield@usu.edu' [marc.mansfield@usu.edu]; mberger@utah.gov; 'mstewart@redleafinc.com' [mstewart@redleafinc.com]; Garvey, Megan [garvey.megan@epa.gov]; miken@utetribe.com; minnieg@utetribe.com; Morales, Monica [Morales.Monica@epa.gov]; 'rpage@ie-cos.com' [rpage@ie-cos.com]; 'rhrenko-browning@utahpetroleum.org' [rhrenko-browning@utahpetroleum.org]; 'Ryan.Clerico@enefit.com' [Ryan.Clerico@enefit.com]; 'Ryan@kairosaerospace.com' [Ryan@kairosaerospace.com]; 'Ryan.Swanson@epenergy.com' [Ryan.Swanson@epenergy.com]; 'scottchew@le.utah.gov' [scottchew@le.utah.gov]; Jackson, Scott [Jackson.Scott@epa.gov]; 'seth.lyman@usu.edu' [seth.lyman@usu.edu]; 'svance@utah.gov' [svance@utah.gov]; 'Spencer_Kimball@eogresources.com' [Spencer_Kimball@eogresources.com]; 'ssiffring@westernenergyalliance.org' [ssiffring@westernenergyalliance.org]; 'Thomas.H.Gibbons@andeavor.com' [Thomas.H.Gibbons@andeavor.com]; 'trang.tran@usu.edu' [trang.tran@usu.edu]; 'ttodd@utah.gov' [ttodd@utah.gov]; 'val.oman@epenergy.com' [val.oman@epenergy.com]; 'vince.christensen@simplot.com' [vince.christensen@simplot.com]; 'woswald@utah.gov' [woswald@utah.gov]; 'jmcqueen@crescentpointenergy.com' [jmcqueen@crescentpointenergy.com]; 'Andrea.Olsen@Simplot.com' [Andrea.Olsen@Simplot.com]; 'cpennell@utah.gov' [cpennell@utah.gov]; Nancy Daher [ndaher@utah.gov]; Doris Vanden Akker [dvandenakker@RQN.COM]; Gabriel Niculescu [niculescu@RQN.COM]

Subject: Uinta Basin Ozone Working Group Meeting
Location: Vernal, Salt Lake City, Denver

Start: 2/12/2019 9:00:00 PM
End: 2/12/2019 10:00:00 PM
Show Time As: Tentative

Recurrence: (none)

Appointment

From: Marie Bradshaw Durrant [MBDurrant@rqn.com]
Sent: 11/27/2018 11:41:07 PM
To: Marie Durrant [MBDurrant@rqn.com]; 'dbrown@tricountyhealth.com' [dbrown@tricountyhealth.com]; 'vince.christensen@simplot.com' [vince.christensen@simplot.com]; 'kvantassell@le.utah.gov' [kvantassell@le.utah.gov]; Bean, Clayton [bean.clayton@epa.gov]; 'ashley@publiclandsolutions.org' [ashley@publiclandsolutions.org]; minnieg@utetribe.com; 'Lolsen@altamontenergy.com' [Lolsen@altamontenergy.com]; 'debbie@breatheutah.org' [debbie@breatheutah.org]; 'Chad.Schlichtemeier@anadarko.com' [Chad.Schlichtemeier@anadarko.com]; Smith, Claudia [Smith.Claudia@epa.gov]; 'rikki.hrenko-browning@enefit.com' [rikki.hrenko-browning@enefit.com]; Morales, Monica [Morales.Monica@epa.gov]; 'Jean.semborski@cop.com' [Jean.semborski@cop.com]; 'jmcqueen@crescentpointenergy.com' [jmcqueen@crescentpointenergy.com]; 'Thomas.H.Gibbons@andeavor.com' [Thomas.H.Gibbons@andeavor.com]; 'Ryan.Swanson@epenergy.com' [Ryan.Swanson@epenergy.com]; 'lonnief@utetribe.com' [lonnief@utetribe.com]; Ex. 6 Personal Privacy (PP); 'trang.tran@usu.edu' [trang.tran@usu.edu]; 'Rhammer@SLRconsulting.com' [Rhammer@SLRconsulting.com]; 'jmathis@tricountyhealth.com' [jmathis@tricountyhealth.com]; 'ssiffring@westernenergyalliance.org' [ssiffring@westernenergyalliance.org]; 'huy.tran@usu.edu' [huy.tran@usu.edu]; 'Ryan@kairosaerospace.com' [Ryan@kairosaerospace.com]; 'evernon@blm.gov' [evernon@blm.gov]; 'scottchew@le.utah.gov' [scottchew@le.utah.gov]; 'jwoodland@crescentpointenergy.com' [jwoodland@crescentpointenergy.com]; 'kburdick@Duchesne.utah.gov' [kburdick@Duchesne.utah.gov]; 'amyc@utetribe.com' [amyc@utetribe.com]; 'corey.jones@epenergy.com' [corey.jones@epenergy.com]; 'chelsea.cantrelle@epenergy.com' [chelsea.cantrelle@epenergy.com]; 'Ryan.Clerico@enefit.com' [Ryan.Clerico@enefit.com]; 'svance@utah.gov' [svance@utah.gov]; 'Jhirschi@enervest.net' [Jhirschi@enervest.net]; 'bstringer@uintah.utah.gov' [bstringer@uintah.utah.gov]; Dresser, Chris [Dresser.Chris@epa.gov]; miken@utetribe.com; 'eehrmantraut@SLRconsulting.com' [eehrmantraut@SLRconsulting.com]; 'bmensinger@trinityconsultants.com' [bmensinger@trinityconsultants.com]; 'mstewart@redleafinc.com' [mstewart@redleafinc.com]; mberger@utah.gov; 'Adrienne.Sandoval@andeavor.com' [Adrienne.Sandoval@andeavor.com]; 'rpage@ie-cos.com' [rpage@ie-cos.com]; 'gtodd@duchesne.utah.gov' [gtodd@duchesne.utah.gov]; 'seth.lyman@usu.edu' [seth.lyman@usu.edu]; 'mariek@utetribe.com' [mariek@utetribe.com]; 'CColclasure@bwenergylaw.com' [CColclasure@bwenergylaw.com]; Beeler, Cindy [Beeler.Cindy@epa.gov]; Garvey, Megan [garvey.megan@epa.gov]; 'Angela.Zivkovich@anadarko.com' [Angela.Zivkovich@anadarko.com]; 'Karen_Pratt@xtoenergy.com' [Karen_Pratt@xtoenergy.com]; 'Djordan@newfield.com' [Djordan@newfield.com]; 'Jwoodall@newfield.com' [Jwoodall@newfield.com]; 'woswald@utah.gov' [woswald@utah.gov]; 'aaverett@sunrise-eng.com' [aaverett@sunrise-eng.com]; Jackson, Scott [Jackson.Scott@epa.gov]; 'dmcneill@utah.gov' [dmcneill@utah.gov]; Lexie Wilson [lexiewilson@utah.gov]; 'joe.sager@epenergy.com' [joe.sager@epenergy.com]; 'Eoman@altamontenergy.com' [Eoman@altamontenergy.com]; 'Daniel.D.Pring@andeavor.com' [Daniel.D.Pring@andeavor.com]; 'ttodd@utah.gov' [ttodd@utah.gov]; 'Spencer_Kimball@eogresources.com' [Spencer_Kimball@eogresources.com]; 'val.oman@epenergy.com' [val.oman@epenergy.com]; 'John.Spencer@simplot.com' [John.Spencer@simplot.com]; 'marc.mansfield@usu.edu' [marc.mansfield@usu.edu]; 'jpatterson@ndnlaw.com' [jpatterson@ndnlaw.com]
CC: 'Semborski, Jean' [Jean.Semborski@conocophillips.com]; 'nhall@utah.gov' [nhall@utah.gov]; 'Olsen, Andrea' [andrea.olsen@Simplot.com]; Ex. 6 Personal Privacy (PP)

Subject: Uinta Basin Working Group Meeting
Location: Vernal, Salt Lake City, Denver

Start: 1/8/2019 9:00:00 PM
End: 1/8/2019 10:00:00 PM
Show Time As: Tentative

Recurrence: (none)

Appointment

From: Darrin Brown [dbrown@tricountyhealth.com]
Sent: 10/30/2018 9:51:37 PM
To: Darrin Brown [dbrown@tricountyhealth.com]; Garvey, Megan [garvey.megan@epa.gov]; Reed Page [rpage@ie-cos.com]; 'scottchew@le.utah.gov' [scottchew@le.utah.gov]; 'Adrienne.Sandoval@andeavor.com' [adrienne.sandoval@andeavor.com]; 'gtodd@duchesne.utah.gov' [gtodd@duchesne.utah.gov]; 'aaverett@sunrise-eng.com' [aaverett@sunrise-eng.com]; 'woswald@utah.gov' [woswald@utah.gov]; bstringer@uintah.utah.gov; 'kvantassell@le.utah.gov' [kvantassell@le.utah.gov]; 'joe.sager@epenergy.com' [joe.sager@epenergy.com]; 'jodyc@utetribe.com' [jodyc@utetribe.com]; 'ashley@publiclandsolutions.org' [ashley@publiclandsolutions.org]; Lexie Wilson [lexiewilson@utah.gov]; 'chelsea.cantrelle@epenergy.com' [chelsea.cantrelle@epenergy.com]; Dave McNeill [dmcneill@utah.gov]; mberger@utah.gov; 'evernon@blm.gov' [evernon@blm.gov]; miken@utetribe.com; 'seth.lyman@usu.edu' [seth.lyman@usu.edu]; 'jpatterson@ndnlaw.com' [jpatterson@ndnlaw.com]; 'huy.tran@usu.edu' [huy.tran@usu.edu]; 'marc.mansfield@usu.edu' [marc.mansfield@usu.edu]; 'Ryan.Clerico@energia.ee' [ryan.clerico@energia.ee]; 'svance@utah.gov' [svance@utah.gov]; 'lonnief@utetribe.com' [lonnief@utetribe.com]; 'j.woodland@crescentpointenergy.com' [j.woodland@crescentpointenergy.com]; 'trang.tran@usu.edu' [trang.tran@usu.edu]; 'amyc@utetribe.com' [amyc@utetribe.com]; Dresser, Chris [Dresser.Chris@epa.gov]; Jordan Mathis [jmathis@tricountyhealth.com]; minnieg@utetribe.com; 'mariek@utetribe.com' [mariek@utetribe.com]; 'debbie@breatheutah.org' [debbie@breatheutah.org]; 'ssiffring@westernenergyalliance.org' [ssiffring@westernenergyalliance.org]; Beeler, Cindy [Beeler.Cindy@epa.gov]

Subject: Invitation: Uinta Basin Ozone Working Group Meeting @ Tue Nov 27, 2018 2pm - 3pm (MST) (garvey.megan@epa.gov)
Attachments: invite.ics
Location: USU Bingham Building, Room 101, Vernal and Ray Quinney & Nebeker, 36 South State Street, Suite 1400, SLC

Start: 11/27/2018 9:00:00 PM
End: 11/27/2018 10:00:00 PM
Show Time As: Busy

Recurrence: (none)

more details »

Uinta Basin Ozone Working Group Meeting

When Tue Nov 27, 2018 2pm – 3pm Mountain Time - Denver

Where USU Bingham Building, Room 101, Vernal and Ray Quinney & Nebeker, 36 South State Street, Suite 1400, SLC (map)

Joining info meet.google.com/dbw-cqyc-air

Or dial: +Ex. 6 Personal Privacy (PP) PIN Ex. 6 Personal Privacy (PP)

Calendar garvey.megan@epa.gov

Who
- Darrin Brown - organizer
- 'garvey.megan@epa.gov'
- Reed Page
- 'scottchew@le.utah.gov'
- 'Adrienne.Sandoval@andeavor.com'
- 'gtodd@duchesne.utah.gov'
- 'aaverett@sunrise-eng.com'
- 'woswald@utah.gov'

- bstringer@uintah.utah.gov
- 'kvantassell@le.utah.gov'
- 'joe.sager@epenergy.com'
- 'jodyc@utetribe.com'
- 'ashley@publiclandsolutions.org'
- 'lexiewilson@utah.gov'
- 'chelsea.cantrelle@epenergy.com'
- Dave McNeill
- 'mberger@utah.gov'
- 'evernon@blm.gov'
- 'miken@utetribe.com'
- 'seth.lyman@usu.edu'
- 'jpatterson@ndnlaw.com'
- 'huy.tran@usu.edu'
- 'marc.mansfield@usu.edu'
- 'Ryan.Clerico@energia.ee'
- 'svance@utah.gov'
- 'lonnief@utetribe.com'
- 'j.woodland@crescentpointenergy.com'
- 'trang.tran@usu.edu'
- 'amyc@utetribe.com'
- 'Dresser.Chris@epa.gov'
- Jordan Mathis
- 'minnieg@utetribe.com'
- 'mariek@utetribe.com'
- 'debbie@breatheutah.org'
- 'ssiffring@westernenergyalliance.org'
- 'Beeler.Cindy@epa.gov'

Going (garvey.megan@epa.gov)? **Yes** - **Maybe** - **No** more options »

Invitation from Google Calendar

You are receiving this courtesy email at the account garvey.megan@epa.gov because you are an attendee of this event.

To stop receiving future updates for this event, decline this event. Alternatively you can sign up for a Google account at https://www.google.com/calendar/ and control your notification settings for your entire calendar.

Forwarding this invitation could allow any recipient to modify your RSVP response. Learn More.

Appointment

From: Darrin Brown [dbrown@tricountyhealth.com]
To: 'garvey.megan@epa.gov' [garvey.megan@epa.gov]; Reed Page [rpage@ie-cos.com]; 'scottchew@le.utah.gov' [scottchew@le.utah.gov]; 'Adrienne.Sandoval@andeavor.com' [adrienne.sandoval@andeavor.com]; 'gtodd@duchesne.utah.gov' [gtodd@duchesne.utah.gov]; 'aaverett@sunrise-eng.com' [aaverett@sunrise-eng.com]; 'woswald@utah.gov' [woswald@utah.gov]; bstringer@uintah.utah.gov; 'kvantassell@le.utah.gov' [kvantassell@le.utah.gov]; 'joe.sager@epenergy.com' [joe.sager@epenergy.com]; 'jodyc@utetribe.com' [jodyc@utetribe.com]; 'ashley@publiclandsolutions.org' [ashley@publiclandsolutions.org]; 'lexiewilson@utah.gov' [lexiewilson@utah.gov]; 'chelsea.cantrelle@epenergy.com' [chelsea.cantrelle@epenergy.com]; Dave McNeill [dmcneill@utah.gov]; 'mberger@utah.gov' [mberger@utah.gov]; 'evernon@blm.gov' [evernon@blm.gov]; 'miken@utetribe.com' [miken@utetribe.com]; 'seth.lyman@usu.edu' [seth.lyman@usu.edu]; 'jpatterson@ndnlaw.com' [jpatterson@ndnlaw.com]; 'huy.tran@usu.edu' [huy.tran@usu.edu]; 'marc.mansfield@usu.edu' [marc.mansfield@usu.edu]; 'Ryan.Clerico@energia.ee' [ryan.clerico@energia.ee]; Darrin Brown [dbrown@tricountyhealth.com]; 'svance@utah.gov' [svance@utah.gov]; 'lonnief@utetribe.com' [lonnief@utetribe.com]; 'j.woodland@crescentpointenergy.com' [j.woodland@crescentpointenergy.com]; 'trang.tran@usu.edu' [trang.tran@usu.edu]; 'amyc@utetribe.com' [amyc@utetribe.com]; 'Dresser.Chris@epa.gov' [dresser.chris@epa.gov]; Jordan Mathis [jmathis@tricountyhealth.com]; 'minnieg@utetribe.com' [minnieg@utetribe.com]; 'mariek@utetribe.com' [mariek@utetribe.com]; 'debbie@breatheutah.org' [debbie@breatheutah.org]; 'ssiffring@westernenergyalliance.org' [ssiffring@westernenergyalliance.org]; 'Beeler.Cindy@epa.gov' [beeler.cindy@epa.gov]

Subject: Uinta Basin Ozone Working Group Meeting
Location: USU Bingham Building, Room 101, Vernal and Ray Quinney & Nebeker, 36 South State Street, Suite 1400, SLC

Start: 11/27/2018 9:00:00 PM
End: 11/27/2018 10:00:00 PM
Show Time As: Tentative

Recurrence: (none)

-::~:~::~::~:~::-
Please do not edit this section of the description.

This event has a video call.
Join: https://meet.google.com/dbw-cqyc-air
+1 Ex. 6 Personal Privacy (PP) PIN: Ex. 6 Personal Privacy (PP)

View your event at
https://www.google.com/calendar/event?action=VIEW&eid=Xzg0cDM0YzFqOHAxNDZiYTE2aDJqMmI5azhwMmppYmEyODhzM2NiOWc2dDMzZ2dhMjZncWoyZGk2OGMgZ2FydmV5Lm1lZ2FuQGVwYS5nb3Y&tok=MjYjZGJyb3duQHRyaWNvdW50eWhlYWx0aC5jb20wYWIwYTAyNmIzNWU3YzJiMGQ2OGE3NDdjYmFhNDZiZWU5NDZjMzNm&ctz=America%2FDenver&hl=en&es=1.
-::~:~::~::~:~::-

Appointment

From: Marie Durrant [MBDurrant@rqn.com]
Sent: 10/9/2018 5:12:21 PM
To: Marie Durrant [MBDurrant@rqn.com]; 'aaverett@sunrise-eng.com' [aaverett@sunrise-eng.com]; 'Adrienne.Sandoval@andeavor.com' [Adrienne.Sandoval@andeavor.com]; 'amyc@utetribe.com' [amyc@utetribe.com]; 'Angela.Zivkovich@anadarko.com' [Angela.Zivkovich@anadarko.com]; 'ashley@publiclandsolutions.org' [ashley@publiclandsolutions.org]; 'bstringer@uintah.utah.gov' [bstringer@uintah.utah.gov]; 'Rhammer@SLRconsulting.com' [Rhammer@SLRconsulting.com]; 'Chad.Schlichtemeier@anadarko.com' [Chad.Schlichtemeier@anadarko.com]; 'chelsea.cantrelle@epenergy.com' [chelsea.cantrelle@epenergy.com]; Dresser, Chris [Dresser.Chris@epa.gov]; Beeler, Cindy [Beeler.Cindy@epa.gov]; Smith, Claudia [Smith.Claudia@epa.gov]; 'dbrown@tricountyhealth.com' [dbrown@tricountyhealth.com]; 'dmcneill@utah.gov' [dmcneill@utah.gov]; 'debbie@breatheutah.org' [debbie@breatheutah.org]; 'Djordan@newfield.com' [Djordan@newfield.com]; 'Eoman@altamontenergy.com' [Eoman@altamontenergy.com]; 'eehrmantraut@SLRconsulting.com' [eehrmantraut@SLRconsulting.com]; 'evernon@blm.gov' [evernon@blm.gov]; 'gtodd@duchesne.utah.gov' [gtodd@duchesne.utah.gov]; 'huy.tran@usu.edu' [huy.tran@usu.edu]; 'jpatterson@ndnlaw.com' [jpatterson@ndnlaw.com]; 'j.woodland@crescentpointenergy.com' [j.woodland@crescentpointenergy.com]; 'joe.sager@epenergy.com' [joe.sager@epenergy.com]; 'John.Spencer@simplot.com' [John.Spencer@simplot.com]; 'jmathis@tricountyhealth.com' [jmathis@tricountyhealth.com]; 'Jhirschi@enervest.net' [Jhirschi@enervest.net]; 'kburdick@Duchesne.utah.gov' [kburdick@Duchesne.utah.gov]; 'kvantassell@le.utah.gov' [kvantassell@le.utah.gov]; 'Lolsen@altamontenergy.com' [Lolsen@altamontenergy.com]; Lexie Wilson [lexiewilson@utah.gov]; 'lonnief@utetribe.com' [lonnief@utetribe.com]; 'mariek@utetribe.com' [mariek@utetribe.com]; 'marc.mansfield@usu.edu' [marc.mansfield@usu.edu]; mberger@utah.gov; 'mstewart@redleafinc.com' [mstewart@redleafinc.com]; Garvey, Megan [garvey.megan@epa.gov]; miken@utetribe.com; minnieg@utetribe.com; Morales, Monica [Morales.Monica@epa.gov]; 'rpage@ie-cos.com' [rpage@ie-cos.com]; 'rikki.hrenko@enefitamericanoil.com' [rikki.hrenko@enefitamericanoil.com]; 'Ryan.Clerico@enefit.com' [Ryan.Clerico@enefit.com]; 'scottchew@le.utah.gov' [scottchew@le.utah.gov]; 'seth.lyman@usu.edu' [seth.lyman@usu.edu]; 'svance@utah.gov' [svance@utah.gov]; 'Spencer_Kimball@eogresources.com' [Spencer_Kimball@eogresources.com]; 'ssiffring@westernenergyalliance.org' [ssiffring@westernenergyalliance.org]; 'Thomas.H.Gibbons@andeavor.com' [Thomas.H.Gibbons@andeavor.com]; 'trang.tran@usu.edu' [trang.tran@usu.edu]; 'ttodd@utah.gov' [ttodd@utah.gov]; 'val.oman@epenergy.com' [val.oman@epenergy.com]; 'vince.christensen@simplot.com' [vince.christensen@simplot.com]; 'woswald@utah.gov' [woswald@utah.gov]; **Ex. 6 Personal Privacy (PP)** 'Karen_Pratt@xtoenergy.com' [Karen_Pratt@xtoenergy.com]

Subject: Uinta Basin Ozone Working Group Meeting
Location: Vernal, Salt Lake City, Denver

Start: 10/30/2018 8:00:00 PM
End: 10/30/2018 10:00:00 PM
Show Time As: Busy

Recurrence: (none)

Appointment

From: Stuart Siffring [ssiffring@westernenergyalliance.org]
Sent: 10/7/2019 8:31:13 PM
To: Stuart Siffring [ssiffring@westernenergyalliance.org]; Gretchen Kern (gretchen.kern@pxd.com) [gretchen.kern@pxd.com]; Jagadeesan Sethuraman [Jagadeesan.Sethuraman@whiting.com]; Jesse Sandlin [Jesse.Sandlin@nblenergy.com]; lfuller@ipaa.org; Jessica Sanchez [jmsanchez@marathonoil.com]; Greg Schrab [gschrab@sm-energy.com]; Garvey, Megan [garvey.megan@epa.gov]

Subject: NSPS OOOOa Technical Revisions discussion
Attachments: Joint Trades and EPA NSPS OOOOa Tech Agenda.docx
Location: Western Energy Alliance conference room and call-in at Ex. 6 Personal Privacy (PP)

Start: 10/8/2019 7:00:00 PM
End: 10/8/2019 8:00:00 PM
Show Time As: Tentative

Recurrence: (none)

Hello,

Attached is the agenda for our meeting to discuss the trade's comments on the NSPS OOOOa technical revisions. Call-in information is: 1 Ex. 6 Personal Privacy (PP) Thanks for your attendance,

-Stuart

Stuart Siffring, PE
Regulatory Analyst
Western Energy Alliance
1775 Sherman St. #2700
Denver, CO 80202
ssiffring@westernenergyalliance.org
303-501-1060

Joint Trades/EPA meeting on NSPS OOOOa Technical Revisions
October 8th, 2019 1:00pm MT
Western Energy Alliance Conference Room
1775 Sherman St. #2700 Denver, CO 80202
Call-in available at: Ex. 6 Personal Privacy (PP)

1. Introductions and Attendees

   EPA
   Western Energy Alliance
   Independent Petroleum Association of America
   American Exploration and Production Council

2. Discuss NSPS OOOOa technical revisions
   a. Industry's previous comments

3. Other Issues

Message

From: Stuart Siffring [ssiffring@westernenergyalliance.org]
Sent: 10/25/2019 3:58:35 PM
To: Stuart Siffring Ex. 6 Personal Privacy (PP)
Subject: Leaving Western Energy Alliance

Hello,

It has been a great pleasure to work with you during my time at Western Energy Alliance, but I am moving on to other opportunities. Feel free to contact me at Ex. 6 Personal Privacy (PP) or Ex. 6 Personal Privacy (PP) if you would like to stay in touch. Thanks!

-Stuart

Stuart Siffring, PE
Regulatory Analyst
Western Energy Alliance
1775 Sherman St. #2700
Denver, CO 80202
ssiffring@westernenergyalliance.org
303-501-1060

Message

From: Stuart Siffring [ssiffring@westernenergyalliance.org]
Sent: 10/11/2018 3:56:06 PM
To: Garvey, Megan [garvey.megan@epa.gov]
Subject: Western Energy Alliance, COGA, CPC meeting with EPA

Hi Megan,

It was great to see you at in Coeur D'Alene last week, what a beautiful place for a conference! Congrats again on your new position, it is a great place to work. I got a chance to talk with Doug for a little bit there and brought up trying to schedule a meeting between WEA, COGA, CPC, and EPA. He mentioned that you were also trying to set something like that up and that I should coordinate the details through you. Does that sound right? If so, I am happy to do the work coordinating the trades if you can come up with a few times over the next month or so that would work for Doug. Thanks for the help, talk to you soon!

-Stuart

Stuart Siffring, PE
Regulatory Analyst
Western Energy Alliance
1775 Sherman St. #2700
Denver, CO 80202
ssiffring@westernenergyalliance.org
303-501-1060

Message

From: Lee Fuller [lfuller@ipaa.org]
Sent: 6/5/2020 9:35:51 PM
To: Garvey, Megan [garvey.megan@epa.gov]
Subject: Re: EPA Response to WEA Feedback on the Oil and Gas New Owner Audit Program

Thanks, Megan.

I appreciate your sharing this information. Candidly, it has been a long time since I looked at this issue. My recollection is that the concerns that were expressed to me by IPAA members related to the nature of the Audit storage tank standards compared to the evolving requirements in the Subpart OOOOa reconsideration. Specifically, the Audit was viewed as tracking the interpretation of the storage tank requirements that the Subpart OOOOa reconsideration might be changing. Much of this related to the averaging issues for controlled tank batteries. As you know, we have had significant issues with interpretations of Subpart OOOO tank regulations. Consequently, if the Subpart OOOOa reconsideration addresses those issues in its final form, engaging in the Audit would commit a company to adapting the standards that we opposed and that would no longer be required under the rules for new tanks after the reconsideration was completed. Admittedly, I haven't revisited Appendix B or the other document referred to in the letter, but my perception is that, at least, Appendix B was tracking the storage tank rule interpretations that the industry believes was inappropriate.

Lee

From: Garvey, Megan <garvey.megan@epa.gov>
Sent: Wednesday, May 27, 2020 5:35 PM
To: Lee Fuller <lfuller@ipaa.org>
Cc: Sethuraman, Jag <Sethuraman.Jag@epa.gov>
Subject: FW: EPA Response to WEA Feedback on the Oil and Gas New Owner Audit Program

Hi, Lee,

Sharing EPA's response to WEA regarding concerns with the New Owner Audit Program. Happy to chat. I believe you and Jag connected recently, so I am copying Jag hereto, as well.

Thanks and hope you are well, Megan

Megan E. Garvey
Senior Counselor
Ex. 6 Personal Privacy (PP)

From: Sullivan, Tim <Sullivan.Tim@epa.gov>
Sent: Wednesday, May 27, 2020 3:20 PM
To: ksgamma@westernenergyalliance.org
Cc: kpinson@westernenergyalliance.org; Garvey, Megan <garvey.megan@epa.gov>; Irving, John

<Irving.John@epa.gov>; Fried, Gregory <Fried.Gregory@epa.gov>; Sullivan, Tim <Sullivan.Tim@epa.gov>
Subject: EPA Response to WEA Feedback on the Oil and Gas New Owner Audit Program

Kathleen:

Thank you for your January 27, 2020 letter providing feedback on the EPA's Oil and Gas New Owner Audit Program. The EPA's response to your letter is attached. Please contact me with any questions or to schedule a meeting as discussed in our response.

Thanks –

Tim

Timothy J. Sullivan
Air Enforcement Division
Office of Civil Enforcement
Office of Enforcement and Compliance Assurance
U.S. Environmental Protection Agency
1595 Wynkoop Street (MC 8MSU)
Denver, Colorado 80202

Phone: 303.312.6196 | Email: sullivan.tim@epa.gov

Help eliminate environmental violations - report tips and complaints at:
http://www.epa.gov/compliance/complaints/index.html

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Message

From: Lee Fuller [lfuller@ipaa.org]
Sent: 6/4/2020 1:20:36 PM
To: Idsal, Anne [idsal.anne@epa.gov]; Tsirigotis, Peter [Tsirigotis.Peter@epa.gov]; Cozzie, David [Cozzie.David@epa.gov]; Marsh, Karen [Marsh.Karen@epa.gov]; Dominguez, Alexander [dominguez.alexander@epa.gov]; Sethuraman, Jag [Sethuraman.Jag@epa.gov]; Garvey, Megan [garvey.megan@epa.gov]
CC: James D. Elliott (jelliott@spilmanlaw.com) [jelliott@spilmanlaw.com]; gretchen kern [gretchen.kern@pxd.com]
Subject: Subpart OOOOa Supplemental Comments
Attachments: Subpart OOOOa Supplemental Comments 06-03-2020.pdf

In April of this year, the Environmental Defense Fund submitted supplement comments to the record on the two oil and natural gas production regulatory proposal pending at EPA. These comments specifically addressed issues that had been raised by IPAA and the Independent Producers coalition. Attached are supplemental comments responding to these comments. Please include them in the appropriate dockets.

If there are any questions, please contact Lee Fuller at lfuller@ipaa.org or at 202-255-2260.

Thank you,

Lee Fuller

June 3, 2020

VIA E-MAIL AND E-FILING

The Honorable Andrew Wheeler, Administrator
US Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Re: Environmental Protection Agency's Oil and Natural Gas Sector: Emission Standards for New, Reconstructed, and Modified Sources Review at 84 Federal Register 50,244 (September 24, 2019) Docket ID No. EPA-HQ-OAR-2017-0757
And
Oil and Natural Gas Sector: Emission Standards for New, Reconstructed, and Modified Sources Reconsideration (October 29, 2018)
Docket ID No. EPA-HQ-OAR-2017-0483

Dear Administrator Wheeler:

The following Comments are submitted on the above-referenced proposed rule (Proposed Policy Rulemaking) on behalf of the following national and state trade associations: the Independent Petroleum Association of America (IPAA). IPAA has participated individually or through the Independent Producers in most, if not all, of the rulemakings and associated litigation since the Environmental Protection Agency (EPA or Agency) proposed to revise the New Source Performance Standards (NSPS) for the Oil and Natural Gas Sector in August 2011. 76 Fed. Reg. 52,738 (Aug. 23, 2011). [1]

IPAA represents the thousands of independent oil and natural gas producers and service companies across the United States. America's independent producers develop 91 percent of the nation's oil and natural gas wells. These companies account for 83 percent of America's oil production, 90 percent of its natural gas and natural gas liquids (NGL) production, and support over 4.5 million American jobs. A recent analysis has shown that independent producers are investing 150 percent of their U.S. cash flow back into American oil and natural gas development to enhance their already aggressive efforts to find and produce more energy.

These comments are filed in response to supplemental comments filed on April 13, 2020, by the Environmental Defense Fund (EDF) for itself and several other professional environmental issues advocacy organizations (EDF 2020 Comments). The EDF 2020 Comments address issues that arise in both the EPA 2018 Reconsideration proposal (EPA-HQ-OAR-2017-0483) and the

[1] IPAA incorporates by reference the Independent Producer Comments on the previous rulemakings associated with 40 C.F.R. Part 60, Subpart OOOO and Subpart OOOOa, including but not limited to the following documents: EPAHQ-OAR-2010-0505-4216, EPA-HQ-OAR-2010-0505-4626, EPA-HQ-OAR-2010-0505-4752, EPA-HQ-OAR2010-0505-4767, EPA-HQ-OAR-2010-0505-7001, EPA-HQ-OAR-2010-0505-7685, EPA-HQ-OAR-2010-0505- 12337, and EPA-HQ-OAR-2010-0505-12454.

EPA 2019 Proposed Policy rulemaking (EPA-HQ-OAR-2017-0757). Within the EDF 2020 Comments, there are specific issues related to comments provided by the IPAA. As the IPAA has shown in past comments, the EDF 2020 Comments continue to distort analyses of methane emissions as they seek to cripple American oil and natural gas production through the use of federal regulations that are not supported factually or legally justified.

Review of Major Issues

To put these supplemental comments in context, it is important to review the larger framework of debate and background on these issues.

1. Far too many accusations have been made regarding the scope and targets of the Subpart OOOO and Subpart OOOOa regulations. Industry does not dispute that it is appropriate to effectively regulate its emissions. For the production component of the oil and natural gas industry, volatile organic compounds (VOC) and methane are emitted together and the technology that controls either will control both. This is not disputed by EDF. For new sources, it makes no difference whether regulations apply to VOC or methane.
2. For most of the regulatory requirements under Subparts OOOO and OOOOa, the basic regulatory choices in the New Source Performance Standards (NSPS) meet the definition in the Clean Air Act for a standard for emissions of air pollutants which reflects the degree of emission limitation achievable through the application of the best system of emission reduction (BSER) which (taking into account the cost of achieving such reduction and any nonair quality health and environmental impact and energy requirements) the Administrator determines has been adequately demonstrated. Many of these technologies – reduced emissions completions, low bleed pneumatic controllers, storage tank vapor recovery – have been used voluntarily by industry years before they were incorporated into the NSPS regulations. Industry's issues with these regulations have been largely related to interpretation and application in specific instances.
3. However, the fugitive emissions component of Subpart OOOOa presents a different circumstance. EPA's choice of its Optical Gas Imaging (OGI) based requirements resulted in locking a technology that is rapidly becoming obsolete. Newer technologies are presenting more cost-effective approaches to achieve EPA's objective but working these technologies into the framework of the NSPS presents an ongoing challenge.
4. The fugitive emissions regulations create an even greater problem regarding their application to low production wells (wells producing 15 BOE/day or less). When EPA was crafting its fugitive emissions program, it did not plan to apply it to low production wells. It never developed an accurate emissions profile or an economic assessment for low production wells. However, when EPA finalized the Subpart OOOOa regulations in 2016 under great political pressure from EDF and other professional environmental advocates, EPA expanded the scope of the requirements to all wells. The purported basis for the change in the final regulations, from the proposed regulations, was on data submitted by EDF during the Subpart OOOOa comment period. While it was apparently appropriate in 2016 to radically change course based on data supported during the comment period, EDF is singing a different tune when EPA is presented information during this comment period that they do not agree with and cannot legitimately refute. Significantly, EPA never revisited the implications of this change with regard its analysis of BSER, particularly with regard to the cost requirements for low production wells.

While the definition of low production wells is 15 b/day for oil and 90 mcfd for natural gas, the national average for low production wells is about 2.8 b/d and 20 mcfd, respectively. A regulatory structure based on high production wells in the hundreds of barrels per day and thousands of mcfd has a vastly different economic impact on low production wells typically operated by small businesses.

5. The EDF and professional environmental advocate driven decision to change the regulated emissions from the Subpart OOOO target of VOC to the Subpart OOOOa target of methane dramatically expands the implications of EPA's low production well decision – especially as to existing sources. Because methane is neither a criteria pollutant nor a hazardous air pollutant, making it the targeted emission triggers the potential use of Clean Air Act Section 111(d). Section 111(d) creates the authority to generate nationwide existing source regulations using the NSPS BSER technology for new sources. While EDF complains EPA's proposal to base regulations on VOCs and then remove the path to regulating existing source does not adequately evaluate the impact on the environment and public health, EPA's decision in 2016 to regulate methane never evaluated the economic impact of regulating existing sources under 111(d). It seems rather ironic that EDF is claiming that EPA is not adequately evaluating the impact of not regulating existing sources under 111(d) when EPA never adequately evaluated the impact of opening Pandora's Box on existing sources when it arbitrarily elected to regulate methane in addition to VOCs under 111(b). This little used Clean Air Act provision was intended to be a limited use section that would apply to a very small number of sources. EPA's prior use of 111(d) affected relatively few facilities. However, its application to the oil and natural gas production industry would cover approximately one million oil and natural gas wells with about 75 percent being low production wells.
6. Unlike other sections of the Clean Air Act, Section 111(d) uses new source requirements rather than existing source technologies such as the Reasonably Available Control Technology (RACT) of the Nonattainment provisions of the Act. EPA's Subpart OOOOa fugitive emissions program will not be cost effective for existing low production wells putting all of these wells that are already facing enormous economic challenges at risk. EPA never evaluated the impact on low production wells of regulating existing sources. As advocated by the IPAA, establishing a sub-category for low production wells would necessitate such evaluation and would help ensure such controls are cost-effective and justified.
7. EDF has shown throughout the entire deliberations over Subpart OOOO and OOOOa that its priority issue has been the application of nationwide regulations to existing oil and natural gas facilities with its primary purpose to eliminate these facilities. Throughout this period, as the IPAA has shown, EDF has demonstrated its persistent efforts to distort any data related to low production wells to achieve this objective.

Evaluating the EDF 2020 Comments

Much of the EDF 2020 Comments hinges on two components. One is a study from Alberta, Canada, "Repeated leak detection and repair surveys reduce methane emissions over scale of years", (Alberta Study). The other is EDF's Methane Policy Analyzer. Before addressing specific accusations in the EDF 2020 Comments, it is useful to review these items.

Alberta Study

The Alberta Study looked at 36 different facilities, 30 of which were well sites or production pads. Ultimately, in its analysis of emissions from production facilities, the report provides detailed information on 22 of these sites. EDF attempts to use the Alberta Study to bolster its recurring allegations that low production wells should be treated the same as high production wells with regard to the application of expensive OGI Leak Detection and Repair (LDAR) programs. However, a closer look at the Alberta Study reveals a different result.

First, while the Alberta Study does parrot the EDF line that low production wells should be regulated, its own data does not address low production wells. The production volume of the smallest well site that the Alberta Study presents is calculated to produce 1300 mcfd. This is over 13 times the regulatory definition of a low production well and over 50 times the average actual low production natural gas well.

Second, the compelling conclusion of the Alberta Study is its assessment that the dominant emissions sources at production operations are vessels – storage tanks. The Study states:

> If tanks do not contain a control equipment like a vapor recovery unit, tank-related emissions are classified as vents. Here, tank-related emissions contributed to 75% of all vented emissions, or 64% of total emissions.

This statement is telling at two levels. One, tank emissions dominate the site emissions overwhelming any leaks that would be found from process equipment. Two, the tanks do not have vapor recovery systems.

What the Alberta Study really says is that tank controls provide the larger benefit in any oil and natural gas production emissions management program. The 2012 Subpart OOOO NSPS required storage tank vapor recovery and these requirements have now been in place for roughly 8 years. Moreover, by identifying this reality, it supports the argument that the IPAA has made regarding the inappropriateness of the 2016 Subpart OOOOa NSPS LDAR requirements for low production wells. Given that the emissions from these wells are small and that storage tanks are the likely sources, the expensive OGI LDAR program is unnecessary. If a program is needed, one that would target storage tanks using methods to assure that thief hatches are closed and seals are maintained would effectively manage these small sources, particularly any existing facilities.

Methane Policy Analyzer

A second key element of the EDF 2020 Comments relates to its efforts to portray the magnitude of methane emissions. EDF presents an array of confusing emissions tables that it attributes to the application of its Methane Policy Analyzer. While the IPAA cannot address those tables with emissions outside oil and natural gas production, the EDF 2020 Comments present emissions estimates in Table 5 related to oil and natural gas production operations. IPAA has addressed this technique previously in earlier comments.[2] These comments were summarized in the Independent Producer comments to the EPA 2019 Proposed Policy rulemaking:[3]

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[2] Independent Producer Response/Supplemental Comments filed June 17, 2019, to Docket ID No. EPA-HQ-OAR-2017-0483, pages 12-15.

[3] Independent Producer Comments filed November 25, 2019, to Docket ID No. EPA-HQ-OAR-2017-0757, pages 20-21.

Assessment of Studies: This EDF report was released with great fanfare during the 2018 World Gas Conference to create the appearance of new data showing methane emissions from the oil and natural gas industry value chain. The report purports to show that emissions are far higher than those reported in EPA GHGI. The JEC then refers to this report as a linchpin of its arguments for changes to the Subpart OOOOa proposal, particularly with regard to the fugitive emissions program with a special focus on low production wells. However, probing its details provides a far different perspective. Some highlights from the Independent Producers 2019 Comments follow:

> This report is not new data. Rather, it is a reconstruction of prior data from others' studies. For example, it regurgitates the same information in the Super-Emitters study and adds some additional material from others.
>
> As a consequence, the report suffers from no certainty regarding the quality of its data by possibly exacerbating bias and inaccuracies through incompatible sampling and data collection methodologies. It accepts as accurate everything it receives and these data have glaring deficiencies.

Additionally, the report is replete with questionable choices and use of data. It relies on short term measurements that it extrapolates to daily and annual emissions. It ignores that its own aerial survey data found no observed emissions from pneumatic controllers and equipment leaks that should have theoretically been high. It relies on the same specious percentage of sales approach as the Super-Emitters report. As the Independent Producers 2019 Comments conclude:

> All of these pieces point to a consistent conclusion regarding the validity of the Assessment of Studies report. It builds on data that is not consistent and then excludes data it does not want. But, the final aspect of its effort is telling. The key to the development of the Assessment of Studies is its statistical manipulation of its data to develop emissions values where it does not have data. Here are some important statements by the authors:
>
> > We assume our underlying emissions pdfs are lognormal, which is expected in a system where many independent random and multiplicative events can contribute to the occurrence and magnitude of emissions
>
> and
>
> > Results from both tests applied to all of the datasets used directly in this work indicate that one cannot reject the null hypothesis that the site-level sample data arise from a lognormal population distribution
>
> These are extremely weak arguments – "we assume … emissions pdfs are lognormal…."; "…one cannot reject the … hypothesis that

> the site-level … data arise from a lognormal population distribution."
>
> If they are not lognormal distributions, the entire framework for the Assessment of Studies report becomes suspect. Correspondingly, looking at the nature of the site emissions data – with all of the flaws associated with the assumptions in evaluating that data – there is little to suggest it is a lognormal distribution. These inadequacies and those described in the EID analysis of the report undermine the validity of the basis for arguing that the Assessment of Studies provides a basis for the fugitive emissions LDAR programs in Subpart OOOOa, particularly in their application to low production wells.

Collectively, the KIG lobby has used these reports to justify its targeting of low production wells. However, they do not make a plausible case. To the extent the KIG interests provide any viable data, it might indicate the most likely source of emissions is from storage tanks and not production equipment – however the volume of emissions is often below regulatory thresholds.

EDF's Methane Policy Analyzer is nothing more than a new name for an old, flawed product. Even though EDF can put together a table that purports to be accurate to a single digit, this calculation is meaningless. Its basis is purely derived from an array of distorted assumptions with the sole purpose of creating a regulatory scheme designed to drive existing low production wells out of business.

EDF's Comments in Context

The EDF 2020 Comments address a number of issues that pale (wilt?) under the light of scrutiny.

First, EDF spends a significant amount of effort highlighting action in Colorado to revise its LDAR requirements for oil and natural gas production facilities. There are two takeaways from these comments that are pertinent. One, Colorado was fully capable of developing its regulations without the need for the punitive nationwide existing source regulatory actions that EDF demands from the federal government. And, other states have developed their own regulatory systems as well. Two, it's unclear whether the Colorado regulations are the same as the NSPS requirements. However, it is apparent that EDF wants to imply that a semi-annual LDAR program for what are implicitly low production wells (storage tanks emitting 2 to 12 tons per year of VOC emissions) is cost effective. IPAA disagrees as described below:

> EDF reports that Colorado determined that cost of the program would be $742/ton for methane/ethane. This amount converts to about $190/mcf of methane.
>
> The average low production natural gas well in Colorado produces about 24 mcfd. The Alberta Study that EDF references in its comments projects a loss rate of about one percent of production for its lower production wells. This would be about 0.24 mcfd.
>
> Assuming that this loss could even be measured and all of it could be recovered (which no one projects as feasible), at a natural gas price of $2.00/mcf, it would result in income of 48 cents/day.

> To recover the cost of the LDAR program, it would require 400 mcf to be captured ($192/mcf ÷ $0.48). At 0.24 mcfd, it would take 1666 days.

Second, the EDF 2020 Comments relate a wandering collection of criticisms of the American Petroleum Institute's (API) assessments of the implications of an existing source regulation under Section 111(d) and throw a myriad of conflicting accusations into the record. IPAA will not try to respond to all of them but several allegations are pertinent to address. One of the major items relates to the number of wells that would be subject to a Section 111(d) regulation. This is an area that the IPAA has addressed several times but it remains important to revisit again. This issue revolves around the mix of existing wells at any given time. While the EDF 2020 Comments are intended to suggest that there is a need for an aggressive Section 111(d) LDAR program, IPAA believes that EDF has inadvertently demonstrated that such a regulation would fall on low production wells with high costs and limited effect.

On page 14 of the EDF 2020 Comments in footnote 53, EDF includes the following information:

> According to Enervus data, described *infra* n. 68, 82% of existing wells produce on average less than 15 barrel equivalents per day, based on the most recent 12 months of production.

This determination is largely consistent with the determinations of the IPAA that the principal impact of a Section 111(d) regulation would fall on low production, small business wells. But, it raises a question of what the universe of wells are that make up the remaining 18 percent of wells and what the emissions profiles of those wells would be. As pointed out earlier, the Alberta Study demonstrated that the predominant emissions at well sites come from uncontrolled storage tanks. Subpart OOOO imposed controls on storage tanks in 2012. The IPAA submitted the following information regarding wells drilled since Subpart OOOO was finalized in its comments on the EPA 2019 Proposed Policy rulemaking:[4]

> From 2012 through 2017, approximately 155,500 wells were drilled. However, several of these years were during low commodity prices that reduced drilling activity. Approximately, 41,000 wells are projected to be drilled in 2018 and 2019. Another 64,600 wells are projected from 2020 through 2022.

While the current economic stress on the oil and natural gas production industry will significantly reduce the number of wells drilled in the 2020-2022 timeframe, there are about 200,000 wells complying with Subpart OOOO. There are about 1,000,000 existing oil and natural gas wells in the United States and these Subpart OOOO wells exceed the 18 percent of the wells that the EDF 2020 Comments describe as being high production wells.

The importance of these facts is that the predominant emissions sources of large existing wells – storage tanks – are well regulated and would not be part of a Subpart OOOOa LDAR based Section 111(d) regulation, nor do they need to be. The issue then becomes whether there are real merits to compelling the 82 percent of existing wells that are low production wells averaging 2.8 barrels/day for oil and 20 mcfd for natural gas to comply with the Subpart OOOOa LDAR requirements. Returning to the Alberta Study, it showed that leaks from processing equipment were a minor share of emissions at well sites; for low production wells they would likely be unmeasurable. At the same time a storage tank based maintenance program could provide a path

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[4] Independent Producer Comments filed November 25, 2019, to Docket ID No. EPA-HQ-OAR-2017-0757, page 10.

to manage those emissions. However, such a program is not the BSER technology that would be applied under a Section 111(d) regulation based on the 2016 Subpart OOOOa NSPS.

Third, the EDF 2020 Comments direct specific criticism toward the IPAA statements on low production wells. The Comments assert that the EDF Methane Policy Analyzer shows significant emissions from low production wells and that the Alberta Study supports regulations on low production wells. Each of these issues has been addressed above. However, to summarize our assessment of these allegations: (1) the EDF Methane Policy Analyzer is a contrived mechanism to generate emissions numbers based on a highly flawed manipulation of limited emissions data that has not been quality controlled, and (2) the Alberta Study concludes that the primary sources of well site emissions are storage tanks and its report did not include any low production wells.

Fourth, the EDF 2020 Comments allege the existence of health risks to those who live near oil and natural gas production facilities. This is a common Keep It in the Ground allegation. But, it is unsupportable. Routinely, these allegations are made in thinly contrived analyzes passed off as health studies. The Energy in Depth Health & Safety project regularly reviews and assesses these studies and others that evaluate them. Many are local reports, but some are more national in scope. Following are links to two reports that are illustrative, showing that oil and natural gas production operations do not present health threats from normal operations:

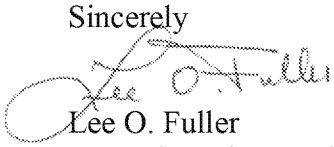
> Anti-Fracking Researcher Quietly Admits: Studies Show No Harmful Pollutants Near Oil And Gas Sites (https://eidhealth.org/anti-fracking-researcher-quietly-admits-studies-show-no-harmful-pollutants-near-oil-and-gas-sites/)
>
> Study Finds Model Used In Activists' Research Doesn't Jibe with Real Air Monitoring (https://www.energyindepth.org/study-finds-model-used-in-activists-research-doesnt-jibe-with-real-air-monitoring/?154)

Conclusion

The EDF 2020 Comments continue the perpetual effort to use the federal regulatory system as a mechanism to end the operation of hundreds of thousands for small business, low production wells through the application of requirements that were never designed for their emissions profile and economics. EPA should not fall into this trap. It has options available to it that can allow for the development of sound low production well emissions management. If it chooses to change the regulated emission to VOC, the management of emissions from new sources will remain the same since both VOC and methane are emitted together and managed simultaneously. Existing sources would be regulated through Control Techniques Guidelines based on RACT. EPA also has the option of crafting a subcategory within the NSPS program for low production wells that would allow EPA to develop appropriate requirements for low production wells that reflect their emissions profile and their economics.

IPAA appreciates the opportunity to submit these comments. If there are any questions, please contact Lee Fuller at lfuller@ipaa.org or by telephone at 202-857-4722.

Sincerely



Lee O. Fuller
Executive Vice President

Message

From: Kathleen Sgamma [ksgamma@westernenergyalliance.org]
Sent: 6/3/2020 7:11:26 PM
To: Sullivan, Tim [Sullivan.Tim@epa.gov]
CC: Kate Pinson [kpinson@westernenergyalliance.org]; Garvey, Megan [garvey.megan@epa.gov]; Irving, John [Irving.John@epa.gov]; Fried, Gregory [Fried.Gregory@epa.gov]
Subject: RE: EPA Response to WEA Feedback on the Oil and Gas New Owner Audit Program

Tim,

Thank you so much for taking the time to consider our input and develop this detailed response. We appreciate the information.

Regards,

Kathleen Sgamma
President
Western Energy Alliance
1775 Sherman St., Suite 2700
Denver, CO 80203
(303) 501-1059 direct
(303) 623-0987 main
ksgamma@westernenergyalliance.org
westernenergyalliance.org
@KathleenSgamma

From: Sullivan, Tim [mailto:Sullivan.Tim@epa.gov]
Sent: Wednesday, May 27, 2020 3:20 PM
To: Kathleen Sgamma
Cc: Kate Pinson; Garvey, Megan; Irving, John; Fried, Gregory; Sullivan, Tim
Subject: EPA Response to WEA Feedback on the Oil and Gas New Owner Audit Program

Kathleen:

Thank you for your January 27, 2020 letter providing feedback on the EPA's Oil and Gas New Owner Audit Program. The EPA's response to your letter is attached. Please contact me with any questions or to schedule a meeting as discussed in our response.

Thanks –

Tim

Timothy J. Sullivan
Air Enforcement Division
Office of Civil Enforcement
Office of Enforcement and Compliance Assurance
U.S. Environmental Protection Agency
1595 Wynkoop Street (MC 8MSU)
Denver, Colorado 80202

Phone: 303.312.6196 | Email: sullivan.tim@epa.gov

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Message

From: Lee Fuller [lfuller@ipaa.org]
Sent: 10/9/2019 12:46:01 AM
To: Garvey, Megan [garvey.megan@epa.gov]
Subject: Re: [External] - Re: Meeting on the proposed NSPS OOOOa Technical Rule

Sounds like a really interesting job.

Sent from my iPhone

> On Oct 8, 2019, at 8:14 PM, Garvey, Megan <garvey.megan@epa.gov> wrote:
>
> My pleasure. Yes - I took over Jim's duties and also work with Doug to manage the RAs and strengthen state relationships.
>
> Sent from my iPhone
>
> On Oct 8, 2019, at 5:12 PM, Lee Fuller <lfuller@ipaa.org> wrote:
>
>> Megan,
>>
>> Thanks for taking so much time today. Did you replace Jim Kenney?
>>
>> Lee
>>
>> Sent from my iPhone
>>
>> On Oct 8, 2019, at 7:00 PM, Garvey, Megan <garvey.megan@epa.gov> wrote:
>>
>>> Hi, Gretchen,
>>>
>>> It was nice talking with you today! Thank you for your time and attention. The additional materials and points in your email below are very helpful to have. Thank you.
>>>
>>> As I review these materials and reflect on our conversation, I'll reach out if any questions come up.
>>>
>>> Megan
>>>
>>> Megan E. Garvey
>>> Senior Advisor for Oil and Gas, Regional Management and State Affairs
>>> Office of the Administrator
>>> U.S. Environmental Protection Agency
>>> Work: 303.312.6192 | Cell: Ex. 6 Personal Privacy (PP)
>>>
>>> **From:** Kern, Gretchen <Gretchen.Kern@pxd.com>
>>> **Sent:** Tuesday, October 8, 2019 4:53 PM
>>> **To:** Garvey, Megan <garvey.megan@epa.gov>
>>> **Cc:** Stuart Siffring <ssiffring@westernenergyalliance.org>; Sanchez, Jessica M. (MRO) <jmsanchez@marathonoil.com>; Lee Fuller

<lfuller@ipaa.org>; Jagadeesan Sethuraman
<Jagadeesan.Sethuraman@whiting.com>
Subject: RE: [External] - Re: Meeting on the proposed NSPS OOOOa Technical Rule

Megan,

It was so nice talking with you today! I wish I could have been there in person. I know we all definitely appreciate your time and attention to our issues with this rulemaking!

I have attached a few items for your review:

1) **EPA's M21/OGI AWP Final Rule dated 12/22/08 – I highlighted/starred relevant sections; pg. 78201 has most important points**
2) EDF's Pathway to Equivalency paper (see pgs. 17-20 specifically)
3) CSU's Methane Emissions Tech. Evaluation Center (METEC) brief overview paper
4) My AMEL/Emg. Tech. talking points document you received today

The first item is the document you requested and I have included these others for your easy reference.

Also, to answer your question again, a basin-wide approval would definitely be preferable. Since we didn't feel we were getting positive feedback from RTP on a basin-wide approval approach for the rule, a few members from API and I drafted this "range of equipment and geographic boundaries" language so that there would be flexibility for EPA to determine the appropriate scope for each approval. The ultimate goal is to not be locked into site by site approval - we feel that many technologies could not show equivalency and further, it would result in a paperwork/administrative burden for both operators and the EPA.

One last point forgot to mention - although some technologies in the future may be as sensitive as OGI and could potentially show eq. on a site level (RTP has said they believe this could be the case), these technologies may not reduce the burden enough on the operator from a cost and manpower perspective to proceed with a lengthy 111(h) notice and comment process to get a site level technology approved. And more cost effective and less man-power intensive technologies would inevitably lose out. There are more details in Pioneer's and API and IPAA's AMEL section in their comments.

Please let me know if you would like to chat further and/or if you have any questions!

Thanks so much! Gretchen

GRETCHEN C. KERN
Sr. Environmental Policy Advisor
Sustainable Development

w 972.969.3936
m Ex. 6 Personal Privacy (PP)

<image001.png>

From: Garvey, Megan <garvey.megan@epa.gov>
Sent: Tuesday, October 01, 2019 3:38 PM
To: Jagadeesan Sethuraman <Jagadeesan.Sethuraman@whiting.com>
Cc: Kern, Gretchen <Gretchen.Kern@pxd.com>; Stuart Siffring <ssiffring@westernenergyalliance.org>; Sanchez, Jessica M. (MRO) <jmsanchez@marathonoil.com>; Lee Fuller <lfuller@ipaa.org>
Subject: [External] - Re: Meeting on the proposed NSPS OOOOa Technical Rule

CAUTION - EXTERNAL SENDER

Hi, Jag,

Thank you for the email and invitation to meet. I am available next Tuesday at 1p. Look forward to the conversation.

Megan

Sent from my iPhone

On Oct 1, 2019, at 8:49 AM, Jagadeesan Sethuraman <Jagadeesan.Sethuraman@whiting.com> wrote:

> Good morning Megan,
>
> Western Energy Alliance, Independent Petroleum Association of America, and American Exploration and Production Council members would like to meet with you to discuss the industry's comments for the proposed NSPS OOOOa Technical Rule. The purpose of this meeting is to review and explain the comments these trades have submitted on this proposed rule. An agenda for the meeting is attached. Our members are available next Tuesday (10/08) at 1:00 P.M. and we hope that this schedule works for you. Please let me know if we need to reschedule this meeting for any reason. We are proposing to meet at the Western Energy Alliance's office. We would appreciate it if you can check your availability and let us at your earliest convenience so that we can let our members know of this meeting.
>
> Thanks,

Jagadeesan Sethuraman
Environmental Manager
Whiting Petroleum Corporation
and its wholly owned subsidiary
Whiting Oil and Gas Corporation
1700 Broadway, Suite 2300
Denver, CO 80290
Direct (303) 390-4986
Cell Ex. 6 Personal Privacy (PP)
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<Joint Trades and EPA NSPS OOOOa Tech Agenda.docx>

Statement of Confidentiality:
This message may contain information that is privileged or confidential. If you receive this transmission in error, please notify the sender by reply e-mail and delete the message and any attachments.

Message

From: Lee Fuller [lfuller@ipaa.org]
Sent: 5/27/2020 9:51:08 PM
To: Garvey, Megan [garvey.megan@epa.gov]
Subject: Re: EPA Response to WEA Feedback on the Oil and Gas New Owner Audit Program

You will. Hint: it won't be laudatory.

From: Garvey, Megan <garvey.megan@epa.gov>
Sent: Wednesday, May 27, 2020 5:50 PM
To: Lee Fuller <lfuller@ipaa.org>
Subject: RE: EPA Response to WEA Feedback on the Oil and Gas New Owner Audit Program

Understood. No rush. Curious to see your response when you get that finalized.

Megan E. Garvey
Senior Counselor
Ex. 6 Personal Privacy (PP)

From: Lee Fuller <lfuller@ipaa.org>
Sent: Wednesday, May 27, 2020 3:47 PM
To: Garvey, Megan <garvey.megan@epa.gov>
Subject: Re: EPA Response to WEA Feedback on the Oil and Gas New Owner Audit Program

Thanks Megan. Will read and get back to you. Right now, I'm deeply embedded in responding to EDFs recent supplemental methane comments.

Lee

Sent from my iPhone

On May 27, 2020, at 5:35 PM, Garvey, Megan <garvey.megan@epa.gov> wrote:

Hi, Lee,

Sharing EPA's response to WEA regarding concerns with the New Owner Audit Program. Happy to chat. I believe you and Jag connected recently, so I am copying Jag hereto, as well.

Thanks and hope you are well, Megan

Megan E. Garvey
Senior Counselor
Ex. 6 Personal Privacy (PP)

From: Sullivan, Tim <Sullivan.Tim@epa.gov>
Sent: Wednesday, May 27, 2020 3:20 PM
To: ksgamma@westernenergyalliance.org
Cc: kpinson@westernenergyalliance.org; Garvey, Megan <garvey.megan@epa.gov>; Irving, John <Irving.John@epa.gov>; Fried, Gregory <Fried.Gregory@epa.gov>; Sullivan, Tim

<Sullivan.Tim@epa.gov>
Subject: EPA Response to WEA Feedback on the Oil and Gas New Owner Audit Program

Kathleen:

Thank you for your January 27, 2020 letter providing feedback on the EPA's Oil and Gas New Owner Audit Program. The EPA's response to your letter is attached. Please contact me with any questions or to schedule a meeting as discussed in our response.

Thanks –

Tim

Timothy J. Sullivan
Air Enforcement Division
Office of Civil Enforcement
Office of Enforcement and Compliance Assurance
U.S. Environmental Protection Agency
1595 Wynkoop Street (MC 8MSU)
Denver, Colorado 80202

Phone: 303.312.6196 | Email: sullivan.tim@epa.gov

Help eliminate environmental violations - report tips and complaints at:
http://www.epa.gov/compliance/complaints/index.html

NOTICE: This message may contain deliberative, attorney-client, attorney work product, or otherwise privileged material. Do not release this message under FOIA without appropriate review. If you are not the intended recipient, please advise the sender immediately by reply e-mail and delete this message and any attachments from your machine and all storage media whether in electronic or hard copy. Thank you.

<OG Audit Programs - Response to WEA_05.27.2020.pdf>

Message

From: Lee Fuller [lfuller@ipaa.org]
Sent: 5/11/2020 9:19:54 PM
To: Garvey, Megan [garvey.megan@epa.gov]
Subject: Re: Final Report - Summary of Input on Oil and Gas Extraction Wastewater Management Practices Under the Clean Water Act

You as well.

Sent from my iPhone

On May 11, 2020, at 4:48 PM, Garvey, Megan <garvey.megan@epa.gov> wrote:

Same on my end! I'll try you later this week (during an afternoon). Hope you continue to stay safe.

Megan E. Garvey
Senior Counselor
Ex. 6 Personal Privacy (PP)

From: Lee Fuller <lfuller@ipaa.org>
Sent: Monday, May 11, 2020 2:46 PM
To: Garvey, Megan <garvey.megan@epa.gov>
Subject: Re: Final Report - Summary of Input on Oil and Gas Extraction Wastewater Management Practices Under the Clean Water Act

Yep. Generally not going many places. Afternoons are better. Mornings seem filled with conference calls and ZOOM meetings. Phone is Personal Phone / Ex. 6

Lee

Sent from my iPhone

On May 11, 2020, at 4:44 PM, Garvey, Megan <garvey.megan@epa.gov> wrote:

You are welcome. Let's catch up soon. Are you around later this week?

Megan E. Garvey
Senior Counselor
Ex. 6 Personal Privacy (PP)

From: Lee Fuller <lfuller@ipaa.org>
Sent: Monday, May 11, 2020 2:43 PM
To: Garvey, Megan <garvey.megan@epa.gov>
Subject: Re: Final Report - Summary of Input on Oil and Gas Extraction Wastewater Management Practices Under the Clean Water Act

Thank you Megan.

Sent from my iPhone

On May 11, 2020, at 4:42 PM, Garvey, Megan <garvey.megan@epa.gov> wrote:

Good afternoon,

Today, May 11, EPA released a final report titled "Summary of Input on Oil and Gas Extraction Wastewater Management Practices Under the Clean Water Act." The report is an update to EPA's May 2019 draft report summarizing input from stakeholders regarding management of produced water from onshore oil and gas extraction activities. The final report provides updated information reflecting input received from states, tribes and stakeholders. The Agency is still determining what, if any, next steps should be taken regarding produced water management under the Clean Water Act. The final report and other related information will be available on EPA's website at: www.epa.gov/eg/study-oil-and-gas-extraction-wastewater-management.

Apologies if this email is duplicative from a previous message you received from the Agency.

Hope you are safe and well,

Megan

Megan E. Garvey
Senior Counselor
Office of the Administrator
U.S. Environmental Protection Agency
Cell: Ex. 6 Personal Privacy (PP)

Message

From: Sethuraman, Jag [Sethuraman.Jag@epa.gov]
Sent: 2/19/2020 11:51:28 PM
To: Kate Pinson [kpinson@westernenergyalliance.org]; Daly, Carl [Daly.Carl@epa.gov]; Garvey, Megan [garvey.megan@epa.gov]
CC: Rikki Hrenko-Browning [rhrenko-browning@utahpetroleum.org]
Subject: RE: Uintah & Ouray FIP ICR Comments

Hi Kate,

Thanks for your comments.

Jagadeesan Sethuraman
Chief of Staff
EPA Region 8
303.312.6446
Sethuraman.Jag@epa.gov

From: Kate Pinson <kpinson@westernenergyalliance.org>
Sent: Wednesday, February 19, 2020 3:33 PM
To: Daly, Carl <Daly.Carl@epa.gov>; Garvey, Megan <garvey.megan@epa.gov>; Sethuraman, Jag <Sethuraman.Jag@epa.gov>
Cc: Rikki Hrenko-Browning <rhrenko-browning@utahpetroleum.org>
Subject: Uintah & Ouray FIP ICR Comments

Hello all,

I have attached the joint comments from Western Energy Alliance and Utah Petroleum Association on the information collection requirements for the Uintah & Ouray Indian Reservation FIP.

We submitted these today for OMB and look forward to providing more detailed comments regarding the full extent of the FIP to EPA by the March deadline.

Thank you,

Kate Noble Pinson
Regulatory Analyst
Western Energy Alliance
1775 Sherman St., Suite 2700
Denver, CO 80203
Personal Phone / Ex. 6 direct
(303) 623-0987 main
kpinson@westernenergyalliance.org
westernenergyalliance.org

Message

From: Kate Pinson [kpinson@westernenergyalliance.org]
Sent: 2/19/2020 10:32:36 PM
To: Daly, Carl [Daly.Carl@epa.gov]; Garvey, Megan [garvey.megan@epa.gov]; Sethuraman, Jag [Sethuraman.Jag@epa.gov]
CC: Rikki Hrenko-Browning [rhrenko-browning@utahpetroleum.org]
Subject: Uintah & Ouray FIP ICR Comments
Attachments: Alliance UPA UandO FIP ICR Comments.pdf

Hello all,

I have attached the joint comments from Western Energy Alliance and Utah Petroleum Association on the information collection requirements for the Uintah & Ouray Indian Reservation FIP.

We submitted these today for OMB and look forward to providing more detailed comments regarding the full extent of the FIP to EPA by the March deadline.

Thank you,

Kate Noble Pinson
Regulatory Analyst
Western Energy Alliance
1775 Sherman St., Suite 2700
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(303) 623-0987 main
kpinson@westernenergyalliance.org
westernenergyalliance.org

February 19, 2020

Office of Management and Budget
Office of Information and Regulatory Affairs
Desk Officer for the Environmental Protection Agency

Re: Information Collection Requirements for the Environmental Protection Agency's (EPA) Federal Implementation Plan for Managing Emissions from Oil and Natural Gas Sources on Indian Country Lands Within the Uintah and Ouray Indian Reservation in Utah, Docket No. EPA-R08-OAR-2015-0709

To Whom It May Concern:

Western Energy Alliance (Alliance) and the Utah Petroleum Association (UPA) support a Federal Implementation Plan (FIP) for the Uintah and Ouray Indian Reservation that enables responsible oil and natural gas development to move forward on tribal lands while creating jobs and expanding economic opportunities for the Ute Indian Tribe and improving air quality. We are still in the process of developing detailed technical comments for the FIP, but appreciate this opportunity to comment to the Office of Management and Budget (OMB) regarding the Information Collection Request (ICR) provisions of the proposed rule.

The Alliance represents 300 member companies engaged in all aspects of environmentally responsible exploration and production of oil and natural gas in the West. The Alliance represents independent oil and gas producers, the majority of which are small businesses with an average of fifteen employees.

UPA is a statewide oil and gas trade association established in 1958 representing companies involved in all aspects of Utah's oil and gas industry. Our members range from independent producers, to midstream and service providers, to major oil and natural gas companies widely recognized as industry leaders responsible for driving technology advancement resulting in environmental and efficiency gains.

Information Collection Requirement Categories

In order to ensure a level playing field is achieved that does not cause tribal lands to be at a disadvantage in comparison to federal and private lands within Utah's Uinta Basin, the U&O FIP should not be overly burdensome in terms of record-keeping and reporting. Overly burdensome regulations can have the unintended effect of making tribal lands less attractive to new development, thereby suppressing economic opportunity and job growth for the Ute Indian Tribe.

To that end, information collection and reporting requirements should be in alignment with existing federal and state requirements. However, we believe the annual reporting requirements proposed in the FIP would put tribal lands at a significant disadvantage compared to nontribal lands because there is

not a similar annual reporting requirement in state regulation. Our comments below on the ICR are focused on ensuring the information collection requirements are not redundant with or overly burdensome in comparison to Utah's Department of Air Quality (UDAQ) regulations and EPA's New Source Performance Standards (NSPS) Subpart OOOOa. As such, we have identified four general categories of data requests and reporting that our comments focus on, per our analysis of the "Information Collection Request - Supporting Statement_U&O FIP" docket ID number EPA-R08-OAR-2015-0709-0035 (ICR supporting statement).

Requirements Aligned with State Requirements: Some of the information collection requirements are in line with state reporting requirements as codified in rules R307-503, R307-506, R307-507 and R307-509. We appreciate such alignment of record-keeping and reporting requirements, which have the salutary effect of minimizing the burden to development on tribal lands by not placing state and private lands at a competitive advantage. We encourage EPA to increase the number of reporting requirements in alignment with state requirements in the final rule. At a minimum, we support the proposed rule's alignment with UDAQ's state requirements for the following information elements:

- Emission calculations for storage vessels and dehydrators
- Throughput for storage vessels
- Control device operating, maintenance, AVO, pilot flame inspections and visible emissions inspections for VOC control devices
- Flare auto-ignitor installation date and manufacturer specifications.

Requirements More Prescriptive than State Requirements: Certain information elements are more detailed or prescriptive than those in the state regulations referenced above. We strongly urge OMB to consider the negative impact that more prescriptive recordkeeping would have on discouraging tribal oil and natural gas development. We request that EPA consider adjusting the following requirements to align them with UDAQ state requirements:

- Vent system's bypasses or downtimes
- Closed vent system inspector name and signature
- Pneumatic controller date of installation or manufacturer specifications
- Recordkeeping location and retention length.

Reporting Requirements: The reporting requirements prescribed in the FIP represent a significant additional burden beyond what UDAQ rules currently mandate. The State of Utah's oil and natural gas rules require record keeping, but do not require any annual reporting, whereas the proposed FIP would require annual reporting. Mandating this additional burdensome reporting would have the deleterious effect of disadvantaging tribal lands. The additional administrative burden to prepare and submit reports on inspections is significant and would require considerable detail for the following:

- Closed vent systems
- Storage tank opening inspections
- Thief hatches
- Bypass devices
- VOC emission control devices
- Pressure relief valves

- Enclosed combustors
- Utility flares.

Requirements Aligned with NSPS Subpart OOOOa Requirements: By being consistent with OOOOa, certain information elements may or may not represent an additional burden to the Tribe, depending on whether the facilities are already covered by OOOOa or not. We support that the FIP's new/modified source permitting requirements are generally consistent with NSPS OOOOa reporting requirements. Additionally, we support not retroactively imposing these requirements on currently exempt facilities because we believe doing so would disadvantage the Tribe by placing a considerably higher reporting burden than does the state.

Administrative Errors in the ICR: We have found a few administrative errors in the ICR supporting statement that do not match with the information contained in the FIP itself. We recommend that the supporting statement be updated to align with the FIP so that the administrative record is consistent. Please note the following inconsistencies:

- Section 49.4183 as referenced in the ICR Supporting Statement is written as Section 49.4184 in the January 21, 2020 Federal Register for the proposed rule
- Section 49.4182 as referenced in the ICR Supporting Statement is written as Section 49.4183 in the January 21, 2020 Federal Register for the proposed rule
- Sections 49.4182 D & F are missing from the January 21, 2020 Federal Register for the proposed rule
- 49.4183(e) and (f) as referenced in the ICR Supporting Statement are written as Section 49.4183(d) and (e) in the January 21, 2020 Federal Register for the proposed rule
- Section 49.4169(b)(2) in the ICR does not match with any section in the proposed regulation and duplicates 49.4184(a)(1)
- Section 49.4184(a)(1)(ii) is missing from the ICR Supporting Statement.

We appreciate OMB considering our comments on the information collection requirements for the U&O FIP. We look forward to providing more detailed comments regarding the full extent of the FIP to EPA by the March deadline.

Sincerely,

Kathleen M. Sgamma
President
Western Energy Alliance

Rikki Hrenko-Browning
President
Utah Petroleum Association

Cc: Doug Benevento, Associate Deputy Administrator
Gregory Sopkin, EPA Region 8 Administrator
Carl Daly, Acting Director, Air and Radiation Division, EPA Region 8

Message

From: Kate Pinson [kpinson@westernenergyalliance.org]
Sent: 2/10/2020 4:31:21 PM
To: Sethuraman, Jag [Sethuraman.Jag@epa.gov]; Garvey, Megan [garvey.megan@epa.gov]
CC: Greg Schrab [gschrab@sm-energy.com]
Subject: Western Energy Alliance New Owner Audit Feedback Comments
Attachments: Western Energy Alliance - New Owner Audit Feedback.pdf; Draft Oil and Gas Design Audit Checklis.docx.pdf

Hello,

Greg Schrab asked me to pass on Western Energy Alliance's comments on the Oil and Gas New Owner Program Questions and Answers document that we sent over on January 27th. I have also attached an electronic copy of the condensed document that OECA provided to TCEQ that is referenced in our comments.

Thank you for considering our feedback.

Kate Noble Pinson
Regulatory Analyst
Western Energy Alliance
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Denver, CO 80203
Personal Phone / Ex. 6 t
(303) 623-0987 main
kpinson@westernenergyalliance.org
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VAPOR CONTROL SYSTEMS FOR OIL AND NATURAL GAS PRODUCTION FACILITIES: DRAFT DESIGN ANALYSIS, FIELD SURVEY, AND CORRECTIVE ACTION

1. Using process flow modeling, determine both the potential minimum and peak instantaneous vapor flow rates for each vapor control system. Include all vapor sources (e.g., atmospheric storage tanks and transfer and loading systems) tied or to be tied into the vapor control system. Use representative samples of gas and pressurized hydrocarbon liquid, equipment inventories, separation equipment operating conditions, and well production rates to perform the process flow modeling, considering the volume, frequency, and duration of individual dump events or transfers to the atmospheric storage tanks.

2. Assess whether vapor control systems are adequately sized and properly functioning considering both the potential minimum and peak instantaneous vapor flow rates. Evaluate the capacity and performance of each vapor control system and control device, consistent with:
    A. The control device's operational parameters (e.g. manufacturer's specifications for operating temperatures, pressures and vapor flow rates); and
    B. The size and design of the vapor control system (e.g. piping, pressure relief devices and available tank headspace).

3. Conduct field surveys of all vapor control system components (e.g. pressure relief devices, thief hatches, mountings, and gaskets for each atmospheric storage tank) and other equipment in VOC service, including:
    A. Verification that the associated equipment is installed and properly operating; and
    B. Inspection of vapor control system components and other equipment in VOC service with an optical gas imaging IR camera during normal operations, including while and immediately after hydrocarbon liquids are sent to the atmospheric storage tanks from all associated well production operations.

4. For those vapor control systems that are not adequately sized or properly functioning (see Paragraph 2 above), and/or emitting VOCs detected with an optical gas imaging IR camera during a vapor control system field survey (see Paragraph 3 above), take corrective actions as appropriate including:
    A. Modifications to reduce the potential peak instantaneous vapor flow rate and/or increase the capacity of the vapor control system;
    B. Modifications to ensure that the operational parameters of each control device are maintained within appropriate ranges (e.g., manufacturer specifications for operating temperatures, pressures and vapor flow rates), to achieve the expected control efficiency; and/or
    C. Repair and/or replacement of compromised equipment associated with the vapor control system that may be causing VOC emissions.

5. Verify the effectiveness of any vapor control system corrective actions involving modifications, repairs or replacements (see Paragraph 4 above), by conducting follow-up vapor control system field surveys with optical gas imaging IR camera inspections (see Paragraph 3 above).

6. Ensure that all emissions sources, including sources of VOC identified during field surveys with optical gas imaging IR camera inspections (see Paragraph 3 above), are properly permitted.

WESTERN ENERGY
ALLIANCE

January 27, 2020

Apple Chapman
Deputy Director, Air Enforcement Division
Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, D.C. 20004

Re: New Owner Clean Air Act Audit Program for Oil and Natural Gas Exploration and Production Facilities

Dear Ms. Chapman:

Thank you for allowing comments on the *Oil and Gas New Owner Program Questions and Answers* document. We appreciate this opportunity to suggest revisions to the Oil and Natural Gas Exploration and Production Facilities New Owner Audit Program Agreement to increase the likelihood that oil and natural gas companies will participate in the program.

Western Energy Alliance supports EPA's goal of increasing compliance through voluntary company audits of their facilities. Because of the hundreds of thousands of exploration and production (E&P) facilities across the nation, self-reporting can ensure many more facilities are brought into compliance than is possible from relying on EPA's enforcement staff inspections alone.

Western Energy Alliance represents 300 companies engaged in all aspects of environmentally responsible exploration and production of oil and natural gas in the West. Alliance members are independents, the majority of which are small businesses with an average of fourteen employees.

The point at which a new company takes over existing assets represents an excellent opportunity to ensure a potentially large number of facilities are brought into compliance. The fresh start afforded the acquiring company is advantageous to EPA, state environmental agencies and the acquiring company. Therefore, a new owner audit program should not start from a punitive perspective, but rather one of cooperation. However, the Alliance finds the agreement is too prescriptive and will discourage companies from using it. We find this to be a weakness also of the self-audit policy for existing facilities announced last month.

To ameliorate the prescriptive nature of both policies, we recommend that appendix B be replaced with the condensed document that OECA provided to the Texas Commission on Environmental Quality in 2019. That document represents a less prescriptive approach that would encourage operators to participate in the self-audit program, while achieving OECA's objectives. By allowing flexibility in how audits are conducted, companies would be more likely to participate. Such an approach would enable companies to identify the

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P 303.623.0987 F 303.893.0709 W WesternEnergyAlliance.org

compliance issues that need to be addressed based on what they actually find in the field, while also enabling them to apply the best technology and practices to bring their facilities fully into compliance.

The heart of the current policy is the vapor control system design method contained in Appendix B. While we understand that EPA has seen examples of leaks from tanks at exploration and production facilities, Appendix B needlessly limits the scope of self-audits to tanks alone. There is also the potential for the self-audit program to be in contradiction with NSPS Subpart OOOOa regarding storage tank systems. This narrow focus ignores other to concerns that could arise in the field and other types of equipment that could require corrective compliance. With too narrow a focus, EPA is not encouraging a compliance evaluation regarding all equipment and field operations, and the commensurate environmental benefits.

Requiring a comprehensive engineering design for tank systems before the agreement can be utilized is a barrier that prevents companies from using the program to achieve compliance. Basing the program on Appendix B creates disincentives for self-auditing all together. If EPA's intention is to increase the number of exploration and production sites in compliance with all Clean Air Act requirements, then Appendix B should be removed.

On the other hand, we fully support EPA's intentions to continue to defer to state audit programs. State audit programs enable greater flexibility and support the Administration's reinvigoration of cooperative federalism. Likewise, we support the Memorandum of Understanding enacted with the State of Wyoming, and encourage such MOUs be signed with other states as well.

Thank you for considering our input. We appreciate a cooperative working relationship with EPA, and self-audit programs enable companies to effectively partner with EPA to protect the environment.

Sincerely,

Kathleen M. Sgamma
President

cc: Doug Benevento, EPA Associate Deputy Administrator
Megan Garvey, EPA Senior Counselor
Susan Bodine, OECA Assistant Administrator
Lawrence Starfield, OECA Principal Deputy Assistant Administrator
John Irving, OECA Deputy Assistant Administrator

ED_005184A_00000108-00002

Message

From: Laura Nelson Ex. 6 Personal Privacy (PP)
Sent: 1/18/2020 3:04:25 PM
To: John Baza [johnbaza@utah.gov]
CC: Aaron Averett [aaverett@sunrise-eng.com]; Adrienne Sandoval [adrienne.sandoval@andeavor.com]; Amy Cesspooch [amyc@utetribe.com]; Andrea Olsen [andrea.olsen@simplot.com]; Angela Zivkovich [angela.zivkovich@anadarko.com]; Ashley Korenblat [ashley@publiclandsolutions.org]; Ashley Miller [ashley@breatheutah.org]; Bill Stringer [bstringer@uintah.utah.gov]; Brian Mesinger [bmensinger@trinityconsultants.com]; Chad schlichtemeier [chad.schlichtemeier@anadarko.com]; Chelsea Cantrelle [chelsea.cantrelle@epenergy.com]; Chris Colclasure [ccolclasure@bwenergylaw.com]; Dresser, Chris [Dresser.Chris@epa.gov]; Christopher Pennell [cpennell@utah.gov]; Beeler, Cindy [Beeler.Cindy@epa.gov]; Smith, Claudia [Smith.Claudia@epa.gov]; Bean, Clayton [bean.clayton@epa.gov]; Corey Jones [corey.jones@epenergy.com]; Daniel D. Pring [daniel.d.pring@andeavor.com]; Darren Brown [dbrown@tricountyhealth.com]; Dave McNeill [dmcneill@utah.gov]; Debrorah Burney-Sigman Ex. 6 Personal Privacy (PP); Douglas Jordan [douglas.jordan@encana.com]; Erik Vernon [evernon@blm.gov]; Erin Ehrmantraut [eehrmantraut@slrconsulting.com]; Erin Oman [eoman@altamontenergy.com]; Gregory Todd [gtodd@duchesne.utah.gov]; Huy Tran [huy.tran@usu.edu]; Jake Woodland [jwoodland@crescentpointenergy.com]; James Woodall [james.woodall@encana.com]; Jean Semborski [jean.semborski@cop.com]; Jeremy Patterson [jpatterson@ndnlaw.com]; Jiillian Yamartino [jillian.yamartino@anadarko.com]; Joe Sager [joe.sager@epenergy.com]; John Spencer [john.spencer@simplot.com]; Jonathan Melton Ex. 6 Personal Privacy (PP); Jordan Mathis [jmathis@tricountyhealth.com]; Josh Hirschi [jhirschi@enervest.net]; Justin Smart [jsmart@pennapowers.com]; Karen Pratt [karen_pratt@xtoenergy.com]; Ken Burdick [kburdick@duchesne.utah.gov]; Levi Olsen [lolsen@altamontenergy.com]; Lexie Wilson [lexiewilson@utah.gov]; Lonnie Favel [lonnief@utetribe.com]; Marc Mansfield [marc.mansfield@usu.edu]; Marcus Trail [mtrail@ramboll.com]; Marie Durrant [marie.durrant@pacificorp.com]; Marie Kaufusi [mariek@utetribe.com]; mberger@utah.gov; Mark Stewart [mstewart@redleafinc.com]; Garvey, Megan [garvey.megan@epa.gov]; Mike M Mckee [mmckee@7county.utah.gov]; miken@utetribe.com; minnieg@utetribe.com; Morales, Monica [Morales.Monica@epa.gov]; Nancy Daher [ndaher@utah.gov]; Nathan Hall [nhall@utah.gov]; Randy Hughes [randy.hughes@middleforkep.com]; Reed Page Ex. 6 Personal Privacy (PP)]; Rikki Lauren Hrenko-Browning [rhrenko-browning@utahpetroleum.org]; Rob Zaback [rob.zaback@middleforkep.com]; Robert Hammer [rhammer@slrconsulting.com]; Ryan Clerico [ryan.clerico@enefit.com]; Ryan Streams [ryan@kairosaerospace.com]; Ryan Swanson [ryan.swanson@epenergy.com]; Scott Baird [scottbaird@utah.gov]; Scott Chew [scottchew@le.utah.gov]; Jackson, Scott [Jackson.Scott@epa.gov]; Seth Lyman [seth.lyman@usu.edu]; Sheila Vance [svance@utah.gov]; Spencer Kimball [spencer_kimball@eogresources.com]; Stephanie Howard [showard@blm.gov]; Stuart Siffring [ssiffring@westernenergyalliance.org]; Teisha Black [teisha.black@epenergy.com]; Thom Carter [thom@ucair.org]; Thomas H. Gibbons [thomas.h.gibbons@andeavor.com]; Trang Tran [trang.tran@usu.edu]; Tyler Wiseman [twiseman@utah.gov]; Tyson Todd [ttodd@utah.gov]; Val Oman [val.oman@epenergy.com]; Vince Christensen [vince.christensen@simplot.com]; Wes Adams [wesadams@utah.gov]; Tommy Thompson [tomthompson@utah.gov]
Subject: Next UBOWG January 22 2:00-3:30 DOGM Offices DRAFT AGENDA
Attachments: UBOWG Agenda 1.22.20 D1.docx

Dear UBOWG,

Thank you all for your engagement in the UBOWG. Please find attached a draft agenda for our upcoming meeting, January 22, 2:00-3:30 PM and hosted at the DOGM offices in SLC. Please let me know any edits or additions you have for the agenda. You can email or reach me by cell, Ex. 6 Personal Privacy (PP)

I look forward to seeing you all next week.

Very best,
Laura

GOVERNOR'S OFFICE OF
ENERGY DEVELOPMENT
Advancing Utah's Energy Future

DRAFT

AGENDA: Uinta Basin Ozone Work Group

Meeting January 22, 2020
2:00-3:30 PM
Division of Oil Gas an Mining
1594 W North Temple, Salt Lake Ctiy
DNR Auditorium Rooms 1040 and 1050

OR Remote Participation

Uinta Basin: USU Campus, Vernal, Utah Room 221R (upstairs in the SW corner)

AND Call-In + Internet Details:
Meeting ID
[HYPERLINK Ex. 6 Personal Privacy (PP)

Phone Numbers
Ex. 6 Personal Privacy (PP)

1. Welcome and Introductions
2. Overview of recent changes and recommendations (Laura, Seth, USU and others)
3. EPA Update: "Emissions inventory development and air quality planning" (Chris Dresser)
4. LORA Awards
5. Other Stakeholder Updates
    a. Ute Tribe
    b. DOGM
    c. DAQ
    d. Industry
    e. USU
    f. BLM
    g. Other
6. Next meeting and other business
7. Close

Message

From: Seth Lyman [seth.lyman@usu.edu]
Sent: 1/15/2020 10:47:47 PM
To: John Baza [johnbaza@utah.gov]; Ex. 6 Personal Privacy (PP)
CC: Aaron Averett [aaverett@sunrise-eng.com]; Adrienne Sandoval [Adrienne.Sandoval@andeavor.com]; Amy Cesspooch [amyc@utetribe.com]; Andrea Olsen [Andrea.Olsen@simplot.com]; Angela Zivkovich [Angela.Zivkovich@anadarko.com]; Ashley Korenblat [ashley@publiclandsolutions.org]; Ashley Miller [ashley@breatheutah.org]; Bill Stringer [bstringer@uintah.utah.gov]; Brian Mesinger [bmensinger@trinityconsultants.com]; Chad schlichtemeier [Chad.Schlichtemeier@anadarko.com]; Chelsea Cantrelle [chelsea.cantrelle@epenergy.com]; Chris Colclasure [CColclasure@bwenergylaw.com]; Dresser, Chris [Dresser.Chris@epa.gov]; Christopher Pennell [cpennell@utah.gov]; Beeler, Cindy [Beeler.Cindy@epa.gov]; Smith, Claudia [Smith.Claudia@epa.gov]; Bean, Clayton [bean.clayton@epa.gov]; Corey Jones [corey.jones@epenergy.com]; Daniel D. Pring [Daniel.D.Pring@andeavor.com]; Darren Brown [dbrown@tricountyhealth.com]; Dave McNeill [dmcneill@utah.gov]; Debrorah Burney-Sigman Ex. 6 Personal Privacy (PP)]; Douglas Jordan [Douglas.Jordan@encana.com]; Erik Vernon [evernon@blm.gov]; Erin Ehrmantraut [eehrmantraut@slrconsulting.com]; Erin Oman [Eoman@altamontenergy.com]; Gregory Todd [gtodd@duchesne.utah.gov]; Huy Tran [huy.tran@usu.edu]; Jake Woodland [jwoodland@crescentpointenergy.com]; James Woodall [james.woodall@encana.com]; Jean Semborski [Jean.semborski@cop.com]; Jeremy Patterson [JPatterson@ndnlaw.com]; Jiillian Yamartino [Jillian.Yamartino@anadarko.com]; Joe Sager [joe.sager@epenergy.com]; John Spencer [John.Spencer@simplot.com]; Jonathan Melton Ex. 6 Personal Privacy (PP) Jordan Mathis [jmathis@tricountyhealth.com]; Josh Hirschi [Jhirschi@enervest.net]; Justin Smart [jsmart@pennapowers.com]; Karen Pratt [Karen_Pratt@xtoenergy.com]; Ken Burdick [Kburdick@duchesne.utah.gov]; Levi Olsen [Lolsen@altamontenergy.com]; Lexie Wilson [lexiewilson@utah.gov]; Lonnie Favel [lonnief@utetribe.com]; Marc Mansfield [marc.mansfield@usu.edu]; Marcus Trail [MTRAIL@ramboll.com]; Marie Durrant [Marie.Durrant@pacificorp.com]; Marie Kaufusi [mariek@utetribe.com]; mberger@utah.gov; Mark Stewart [mstewart@redleafinc.com]; Garvey, Megan [garvey.megan@epa.gov]; Mike M Mckee [mmckee@7county.utah.gov]; miken@utetribe.com; minnieg@utetribe.com; Morales, Monica [Morales.Monica@epa.gov]; Nancy Daher [ndaher@utah.gov]; Nathan Hall [nhall@utah.gov]; Randy Hughes [randy.hughes@middleforkep.com]; Reed Page Ex. 6 Personal Privacy (PP); Rikki Lauren Hrenko-Browning [Rhrenko-browning@utahpetroleum.org]; Rob Zaback [rob.zaback@middleforkep.com]; Robert Hammer [rhammer@slrconsulting.com]; Ryan Clerico [Ryan.Clerico@enefit.com]; Ryan Streams [Ryan@kairosaerospace.com]; Ryan Swanson [Ryan.Swanson@epenergy.com]; Scott Baird [scottbaird@utah.gov]; Scott Chew [scottchew@le.utah.gov]; Jackson, Scott [Jackson.Scott@epa.gov]; Sheila Vance [svance@utah.gov]; Spencer Kimball [spencer_kimball@eogresources.com]; Stephanie Howard [showard@blm.gov]; Stuart Siffring [ssiffring@westernenergyalliance.org]; Teisha Black [Teisha.Black@epenergy.com]; Thom Carter [thom@ucair.org]; Thomas H. Gibbons [Thomas.H.Gibbons@andeavor.com]; Trang Tran [trang.tran@usu.edu]; Tyler Wiseman [twiseman@utah.gov]; Tyson Todd [ttodd@utah.gov]; Val Oman [val.oman@epenergy.com]; Vince Christensen [vince.christensen@simplot.com]; Wes Adams [wesadams@utah.gov]; Tommy Thompson [tomthompson@utah.gov]
Subject: RE: Transition and Next UBOWG January 22 2:00-3:30 DOGM Offices

I'm sorry for sending another email to everyone, but for those in the Uinta Basin, we encourage you to gather with us at USU's campus in Vernal for the meeting. We will be in Room 221R (upstairs in the SW corner). -Seth

From: John Baza <johnbaza@utah.gov>
Sent: Wednesday, January 15, 2020 10:23 AM
To: LRNLSN@yahoo.com
Cc:
Subject: Re: Transition and Next UBOWG January 22 2:00-3:30 DOGM Offices

Dear Uinta Basin Ozone Working Group.

As indicated by Dr. Nelson's last e-mail, the next meeting of the UBOWG is scheduled for 2:00-3:30 p.m. on Wednesday, January 22nd at the Dept. of Natural Resources, 1594 W. North Temple in Salt Lake City. The

meeting will be held in the DNR auditorium rooms 1040 and 1050. You will shortly receive a calendar invitation for the meeting from either Tom Thompson or myself. The invitation will include a teleconferencing option using Google Hangouts that will have both a web link and/or phone dial-in number to connect remotely. If anyone is anticipating presentation of information via their computer, then please let me know ahead of time so that we can make proper connectivity arrangements.

Thanks and I will see you next Wednesday.

John

John R. Baza, P.E.
Director
Utah Division of Oil, Gas and Mining
P.O. Box 145801
Salt Lake City, UT 84114-5801
Office ph. 801-538-5334

On Thu, Jan 9, 2020 at 4:33 PM Laura Nelson <lnelson@utah.gov> wrote:

Dear Uinta Basin Ozone Working Group.

I first want to thank all of you for your commitment and support to this work group and to providing meaningful pathways for both environmental and economic results that benefit our state and our Uinta Basin communities.

I also want to let each of you know that I am retiring from state government, wrapping up my tenure today. I remain committed to the work we are doing and do plan to facilitate our next meeting now scheduled for January 22, 2020, 2:00-3:30 at the offices of the Division of OIl Gas and Mining, 1594 West North Temple, Salt Lake City. Many thanks to John Baza for arranging the space. We will also make conferencing and presentation capabilities available. More details and a formal agenda will be forthcoming. In the interim, please feel free to contact me at Ex. 6 Personal Privacy (PP)

All the best,
Laura

--

Dr. Laura Nelson
Energy Advisor and
Executive Director
Governor's Office of Energy Development
Advancing Utah's Energy Future

(801) 538-8726

energy.utah.gov

GOVERNOR'S OFFICE OF
ENERGY DEVELOPMENT
Advancing Utah's Energy Future

Appointment

From: Tom Thompson [tomthompson@utah.gov]
Sent: 1/15/2020 5:26:52 PM
To: johnbaza@utah.gov; Smith, Claudia [Smith.Claudia@epa.gov]; Sheila Vance [svance@utah.gov]; Chris Colclasure [ccolclasure@bwenergylaw.com]; Tyson Todd [ttodd@utah.gov]; Jackson, Scott [Jackson.Scott@epa.gov]; Angela Zivkovich [angela.zivkovich@anadarko.com]; miken@utetribe.com; Joe Sager [joe.sager@epenergy.com]; Huy Tran [huy.tran@usu.edu]; Randy Hughes [randy.hughes@middleforkep.com]; Bill Stringer [bstringer@uintah.utah.gov]; Jiillian Yamartino [jillian.yamartino@anadarko.com]; Rikki Lauren Hrenko-Browning [rhrenko-browning@utahpetroleum.org]; Jordan Mathis [jmathis@tricountyhealth.com]; Seth Lyman [seth.lyman@usu.edu]; Ashley Miller [ashley@breatheutah.org]; Teisha Black [teisha.black@epenergy.com]; mberger@utah.gov; Tyler Wiseman [twiseman@utah.gov]; Christopher Pennell [cpennell@utah.gov]; Chad schlichtemeier [chad.schlichtemeier@anadarko.com]; Adrienne Sandoval [adrienne.sandoval@andeavor.com]; Ken Burdick [kburdick@duchesne.utah.gov]; Trang Tran [trang.tran@usu.edu]; Laura Nelson [lnelson@utah.gov]; minnieg@utetribe.com; Morales, Monica [Morales.Monica@epa.gov]; Bean, Clayton [bean.clayton@epa.gov]; Stephanie Howard [showard@blm.gov]; Nathan Hall [nhall@utah.gov]; Ryan Swanson [ryan.swanson@epenergy.com]; Robert Hammer [rhammer@slrconsulting.com]; Marie Kaufusi [mariek@utetribe.com]; Erin Ehrmantraut [eehrmantraut@slrconsulting.com]; Marcus Trail [mtrail@ramboll.com]; Scott Baird [scottbaird@utah.gov]; Dave McNeill [dmcneill@utah.gov]; Spencer Kimball [spencer_kimball@eogresources.com]; Chelsea Cantrelle [chelsea.cantrelle@epenergy.com]; James Woodall [james.woodall@encana.com]; Vince Christensen [vince.christensen@simplot.com]; Rob Zaback [rob.zaback@middleforkep.com]; Nancy Daher [ndaher@utah.gov]; Karen Pratt [karen_pratt@xtoenergy.com]; Gregory Todd [gtodd@duchesne.utah.gov]; Jeremy Patterson [jpatterson@ndnlaw.com]; Thomas H. Gibbons [thomas.h.gibbons@andeavor.com]; Wes Adams [wesadams@utah.gov]; Josh Hirschi [jhirschi@enervest.net]; Debrorah Burney-Sigman Ex. 6 Personal Privacy (PP); Beeler, Cindy [Beeler.Cindy@epa.gov]; Lonnie Favel [lonnief@utetribe.com]; Ashley Korenblat [ashley@publiclandsolutions.org]; Darrin Brown [dbrown@tricountyhealth.com]; Marc Mansfield [marc.mansfield@usu.edu]; Lexie Wilson [lexiewilson@utah.gov]; Thom Carter [thom@ucair.org]; Corey Jones [corey.jones@epenergy.com]; Ryan Clerico [ryan.clerico@enefit.com]; Val Oman [val.oman@epenergy.com]; Erik Vernon [evernon@blm.gov]; Jean Semborski [jean.semborski@cop.com]; Reed Page Ex. 6 Personal Privacy (PP); Stuart Siffring [ssiffring@westernenergyalliance.org]; Justin Smart [jsmart@pennapowers.com]; John Spencer [john.spencer@simplot.com]; Jonathan Melton Ex. 6 Personal Privacy (PP); Amy Cesspooch [amyc@utetribe.com]; Douglas Jordan [douglas.jordan@encana.com]; Jake Woodland [jwoodland@crescentpointenergy.com]; Scott Chew [scottchew@le.utah.gov]; Garvey, Megan [garvey.megan@epa.gov]; Marie Durrant [marie.durrant@pacificorp.com]; Brian Mesinger [bmensinger@trinityconsultants.com]; Daniel D. Pring [daniel.d.pring@andeavor.com]; Dresser, Chris [Dresser.Chris@epa.gov]; Mark Stewart [mstewart@redleafinc.com]; Mike M Mckee [mmckee@7county.utah.gov]; Erin Oman [eoman@altamontenergy.com]; Aaron Averett [aaverett@sunrise-eng.com]; Andrea Olsen [andrea.olsen@simplot.com]; Ryan Streams [ryan@kairosaerospace.com]; Levi Olsen [lolsen@altamontenergy.com]

Subject: Invitation: Ozone meeting @ Wed Jan 22, 2020 2pm - 3:30pm (MST) (garvey.megan@epa.gov)
Attachments: invite.ics

Start: 1/22/2020 9:00:00 PM
End: 1/22/2020 10:30:00 PM
Show Time As: Tentative

Recurrence: (none)

You have been invited to the following event.

Ozone meeting

When Wed Jan 22, 2020 2pm – 3:30pm Mountain Time - Denver

Joining info Ex. 6 Personal Privacy (PP)

Or dial: Ex. 6 Personal Privacy (PP) More phone numbers

Calendar garvey.megan@epa.gov

Who

- Tom Thompson - organizer
- johnbaza@utah.gov
- Claudia Smith
- Sheila Vance
- Chris Colclasure
- Tyson Todd
- Scott Jackson
- Angela Zivkovich
- Mike Natchees
- Joe Sager
- Huy Tran
- Randy Hughes
- Bill Stringer
- Jiillian Yamartino
- Rikki Lauren Hrenko-Browning
- Jordan Mathis
- Seth Lyman
- Ashley Miller
- Teisha Black
- Mark Berger
- Tyler Wiseman
- Christopher Pennell
- Chad schlichtemeier
- Adrienne Sandoval
- Ken Burdick
- Trang Tran
- Laura Nelson
- Minnie Grant
- monica Morales
- Clayton Bean
- Stephanie Howard
- Nathan Hall
- Ryan Swanson
- Robert Hammer
- Marie Kaufusi
- Erin Ehrmantraut
- Marcus Trail
- Scott Baird
- Dave McNeill
- Spencer Kimball
- Chelsea Cantrelle
- James Woodall
- Vince Christensen

- Rob Zaback
- Nancy Daher
- Karen Pratt
- Gregory Todd
- Jeremy Patterson
- Thomas H. Gibbons
- Wes Adams
- Josh Hirschi
- Debrorah Burney-Sigman
- Cindy Beeler
- Lonnie Favel
- Ashley Korenblat
- Darrin Brown
- Marc Mansfield
- Lexie Wilson
- Thom Carter
- Corey Jones
- Ryan Clerico
- Val Oman
- Erik Vernon
- Jean Semborski
- Reed Page
- Stuart Siffring
- Justin Smart
- John Spencer
- Jonathan Melton
- Amy Cesspooch
- Douglas Jordan
- Jake Woodland
- Scott Chew
- Megan Garvey
- Marie Durrant
- Brian Mesinger
- Daniel D. Pring
- Chris Dresser
- Mark Stewart
- Mike M Mckee
- Erin Oman
- Aaron Averett
- Andrea Olsen
- Ryan Streams
- Levi Olsen

more details »
Going (garvey.megan@epa.gov)? **Yes** - **Maybe** - **No** more options »

Invitation from Google Calendar

You are receiving this courtesy email at the account garvey.megan@epa.gov because you are an attendee of this event.

To stop receiving future updates for this event, decline this event. Alternatively you can sign up for a Google account at https://www.google.com/calendar/ and control your notification settings for your entire calendar.

Forwarding this invitation could allow any recipient to send a response to the organizer and be added to the guest list, or invite others regardless of their own invitation status, or to modify your RSVP. Learn More.

Appointment

From: Tom Thompson [tomthompson@utah.gov]

To: Tom Thompson [tomthompson@utah.gov]; johnbaza@utah.gov; Claudia Smith [smith.claudia@epa.gov]; Sheila Vance [svance@utah.gov]; Chris Colclasure [ccolclasure@bwenergylaw.com]; Tyson Todd [ttodd@utah.gov]; Scott Jackson [jackson.scott@epa.gov]; Angela Zivkovich [angela.zivkovich@anadarko.com]; Mike Natchees [miken@utetribe.com]; Joe Sager [joe.sager@epenergy.com]; Huy Tran [huy.tran@usu.edu]; Randy Hughes [randy.hughes@middleforkep.com]; Bill Stringer [bstringer@uintah.utah.gov]; Jiillian Yamartino [jillian.yamartino@anadarko.com]; Rikki Lauren Hrenko-Browning [rhrenko-browning@utahpetroleum.org]; Jordan Mathis [jmathis@tricountyhealth.com]; Seth Lyman [seth.lyman@usu.edu]; Ashley Miller [ashley@breatheutah.org]; Teisha Black [teisha.black@epenergy.com]; Mark Berger [mberger@utah.gov]; Tyler Wiseman [twiseman@utah.gov]; Christopher Pennell [cpennell@utah.gov]; Chad schlichtemeier [chad.schlichtemeier@anadarko.com]; Adrienne Sandoval [adrienne.sandoval@andeavor.com]; Ken Burdick [kburdick@duchesne.utah.gov]; Trang Tran [trang.tran@usu.edu]; Laura Nelson [lnelson@utah.gov]; Minnie Grant [minnieg@utetribe.com]; monica Morales [morales.monica@epa.gov]; Clayton Bean [bean.clayton@epa.gov]; Stephanie Howard [showard@blm.gov]; Nathan Hall [nhall@utah.gov]; Ryan Swanson [ryan.swanson@epenergy.com]; Robert Hammer [rhammer@slrconsulting.com]; Marie Kaufusi [mariek@utetribe.com]; Erin Ehrmantraut [eehrmantraut@slrconsulting.com]; Marcus Trail [mtrail@ramboll.com]; Scott Baird [scottbaird@utah.gov]; Dave McNeill [dmcneill@utah.gov]; Spencer Kimball [spencer_kimball@eogresources.com]; Chelsea Cantrelle [chelsea.cantrelle@epenergy.com]; James Woodall [james.woodall@encana.com]; Vince Christensen [vince.christensen@simplot.com]; Rob Zaback [rob.zaback@middleforkep.com]; Nancy Daher [ndaher@utah.gov]; Karen Pratt [karen_pratt@xtoenergy.com]; Gregory Todd [gtodd@duchesne.utah.gov]; Jeremy Patterson [jpatterson@ndnlaw.com]; Thomas H. Gibbons [thomas.h.gibbons@andeavor.com]; Wes Adams [wesadams@utah.gov]; Josh Hirschi [jhirschi@enervest.net]; Debrorah Burney-Sigman Ex. 6 Personal Privacy (PP); Cindy Beeler [beeler.cindy@epa.gov]; Lonnie Favel [lonnief@utetribe.com]; Ashley Korenblat [ashley@publiclandsolutions.org]; Darrin Brown [dbrown@tricountyhealth.com]; Marc Mansfield [marc.mansfield@usu.edu]; Lexie Wilson [lexiewilson@utah.gov]; Thom Carter [thom@ucair.org]; Corey Jones [corey.jones@epenergy.com]; Ryan Clerico [ryan.clerico@enefit.com]; Val Oman [val.oman@epenergy.com]; Erik Vernon [evernon@blm.gov]; Jean Semborski [jean.semborski@cop.com]; Reed Page Ex. 6 Personal Privacy (PP); Stuart Siffring [ssiffring@westernenergyalliance.org]; Justin Smart [jsmart@pennapowers.com]; John Spencer [john.spencer@simplot.com]; Jonathan Melton Ex. 6 Personal Privacy (PP); Amy Cesspooch [amyc@utetribe.com]; Douglas Jordan [douglas.jordan@encana.com]; Jake Woodland [jwoodland@crescentpointenergy.com]; Scott Chew [scottchew@le.utah.gov]; Megan Garvey [garvey.megan@epa.gov]; Marie Durrant [marie.durrant@pacificorp.com]; Brian Mesinger [bmensinger@trinityconsultants.com]; Daniel D. Pring [daniel.d.pring@andeavor.com]; Chris Dresser [dresser.chris@epa.gov]; Mark Stewart [mstewart@redleafinc.com]; Mike M Mckee [mmckee@7county.utah.gov]; Erin Oman [eoman@altamontenergy.com]; Aaron Averett [aaverett@sunrise-eng.com]; Andrea Olsen [andrea.olsen@simplot.com]; Ryan Streams [ryan@kairosaerospace.com]; Levi Olsen [lolsen@altamontenergy.com]

Subject: Ozone meeting

Start: 1/22/2020 9:00:00 PM
End: 1/22/2020 10:30:00 PM
Show Time As: Tentative

Recurrence: (none)

-::~:~::~::~:~::-
Please do not edit this section of the description.

This event has a video call.

Ex. 6 Personal Privacy (PP)

View your event at

Ex. 6 Personal Privacy (PP)

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Message

From: John Baza [johnbaza@utah.gov]
Sent: 1/15/2020 5:23:20 PM
To: Ex. 6 Personal Privacy (PP)
CC: Aaron Averett [aaverett@sunrise-eng.com]; Adrienne Sandoval [Adrienne.Sandoval@andeavor.com]; Amy Cesspooch [amyc@utetribe.com]; Andrea Olsen [Andrea.Olsen@simplot.com]; Angela Zivkovich [Angela.Zivkovich@anadarko.com]; Ashley Korenblat [ashley@publiclandsolutions.org]; Ashley Miller [ashley@breatheutah.org]; Bill Stringer [bstringer@uintah.utah.gov]; Brian Mesinger [bmensinger@trinityconsultants.com]; Chad schlichtemeier [Chad.Schlichtemeier@anadarko.com]; Chelsea Cantrelle [chelsea.cantrelle@epenergy.com]; Chris Colclasure [CColclasure@bwenergylaw.com]; Dresser, Chris [Dresser.Chris@epa.gov]; Christopher Pennell [cpennell@utah.gov]; Beeler, Cindy [Beeler.Cindy@epa.gov]; Smith, Claudia [Smith.Claudia@epa.gov]; Bean, Clayton [bean.clayton@epa.gov]; Corey Jones [corey.jones@epenergy.com]; Daniel D. Pring [Daniel.D.Pring@andeavor.com]; Darren Brown [dbrown@tricountyhealth.com]; Dave McNeill [dmcneill@utah.gov]; Debrorah Burney-Sigman Ex. 6 Personal Privacy (PP); Douglas Jordan [Douglas.Jordan@encana.com]; Erik Vernon [evernon@blm.gov]; Erin Ehrmantraut [eehrmantraut@slrconsulting.com]; Erin Oman [Eoman@altamontenergy.com]; Gregory Todd [gtodd@duchesne.utah.gov]; Huy Tran [huy.tran@usu.edu]; Jake Woodland [jwoodland@crescentpointenergy.com]; James Woodall [james.woodall@encana.com]; Jean Semborski [Jean.semborski@cop.com]; Jeremy Patterson [JPatterson@ndnlaw.com]; Jiillian Yamartino [Jillian.Yamartino@anadarko.com]; Joe Sager [joe.sager@epenergy.com]; John Spencer [John.Spencer@simplot.com]; Jonathan Melton Ex. 6 Personal Privacy (PP) Jordan Mathis [jmathis@tricountyhealth.com]; Josh Hirschi [Jhirschi@enervest.net]; Justin Smart [jsmart@pennapowers.com]; Karen Pratt [Karen_Pratt@xtoenergy.com]; Ken Burdick [Kburdick@duchesne.utah.gov]; Levi Olsen [Lolsen@altamontenergy.com]; Lexie Wilson [lexiewilson@utah.gov]; Lonnie Favel [lonnief@utetribe.com]; Marc Mansfield [marc.mansfield@usu.edu]; Marcus Trail [MTRAIL@ramboll.com]; Marie Durrant [Marie.Durrant@pacificorp.com]; Marie Kaufusi [mariek@utetribe.com]; mberger@utah.gov; Mark Stewart [mstewart@redleafinc.com]; Garvey, Megan [garvey.megan@epa.gov]; Mike M Mckee [mmckee@7county.utah.gov]; miken@utetribe.com; minnieg@utetribe.com; Morales, Monica [Morales.Monica@epa.gov]; Nancy Daher [ndaher@utah.gov]; Nathan Hall [nhall@utah.gov]; Randy Hughes [randy.hughes@middleforkep.com]; Reed Page Ex. 6 Personal Privacy (PP) Rikki Lauren Hrenko-Browning [Rhrenko-browning@utahpetroleum.org]; Rob Zaback [rob.zaback@middleforkep.com]; Robert Hammer [rhammer@slrconsulting.com]; Ryan Clerico [Ryan.Clerico@enefit.com]; Ryan Streams [Ryan@kairosaerospace.com]; Ryan Swanson [Ryan.Swanson@epenergy.com]; Scott Baird [scottbaird@utah.gov]; Scott Chew [scottchew@le.utah.gov]; Jackson, Scott [Jackson.Scott@epa.gov]; Seth Lyman [seth.lyman@usu.edu]; Sheila Vance [svance@utah.gov]; Spencer Kimball [spencer_kimball@eogresources.com]; Stephanie Howard [showard@blm.gov]; Stuart Siffring [ssiffring@westernenergyalliance.org]; Teisha Black [Teisha.Black@epenergy.com]; Thom Carter [thom@ucair.org]; Thomas H. Gibbons [Thomas.H.Gibbons@andeavor.com]; Trang Tran [trang.tran@usu.edu]; Tyler Wiseman [twiseman@utah.gov]; Tyson Todd [ttodd@utah.gov]; Val Oman [val.oman@epenergy.com]; Vince Christensen [vince.christensen@simplot.com]; Wes Adams [wesadams@utah.gov]; Tommy Thompson [tomthompson@utah.gov]
Subject: Re: Transition and Next UBOWG January 22 2:00-3:30 DOGM Offices

Dear Uinta Basin Ozone Working Group.

As indicated by Dr. Nelson's last e-mail, the next meeting of the UBOWG is scheduled for 2:00-3:30 p.m. on Wednesday, January 22nd at the Dept. of Natural Resources, 1594 W. North Temple in Salt Lake City. The meeting will be held in the DNR auditorium rooms 1040 and 1050. You will shortly receive a calendar invitation for the meeting from either Tom Thompson or myself. The invitation will include a teleconferencing option using Google Hangouts that will have both a web link and/or phone dial-in number to connect remotely. If anyone is anticipating presentation of information via their computer, then please let me know ahead of time so that we can make proper connectivity arrangements.

Thanks and I will see you next Wednesday.

John

John R. Baza, P.E.
Director
Utah Division of Oil, Gas and Mining
P.O. Box 145801
Salt Lake City, UT 84114-5801
Office ph. 801-538-5334

On Thu, Jan 9, 2020 at 4:33 PM Laura Nelson <lnelson@utah.gov> wrote:

Dear Uinta Basin Ozone Working Group.

I first want to thank all of you for your commitment and support to this work group and to providing meaningful pathways for both environmental and economic results that benefit our state and our Uinta Basin communities.

I also want to let each of you know that I am retiring from state government, wrapping up my tenure today. I remain committed to the work we are doing and do plan to facilitate our next meeting now scheduled for January 22, 2020, 2:00-3:30 at the offices of the Division of OIl Gas and Mining, 1594 West North Temple, Salt Lake City. Many thanks to John Baza for arranging the space. We will also make conferencing and presentation capabilities available. More details and a formal agenda will be forthcoming. In the interim, please feel free to contact me at Ex. 6 Personal Privacy (PP)

All the best,
Laura

--

Dr. Laura Nelson
Energy Advisor and
Executive Director
Governor's Office of Energy Development
Advancing Utah's Energy Future

(801) 538-8726
energy.utah.gov

Message

From: Lee Fuller [lfuller@ipaa.org]
Sent: 1/14/2020 3:34:07 PM
To: Garvey, Megan [garvey.megan@epa.gov]
Subject: RE: VoiceMail

I should be generally available all day today.

From: Garvey, Megan <garvey.megan@epa.gov>
Sent: Monday, January 13, 2020 8:48 PM
To: Lee Fuller <lfuller@ipaa.org>
Subject: RE: VoiceMail

I'll try you tomorrow. Thanks, Lee.

Megan

Megan E. Garvey
Senior Counselor
Ex. 6 Personal Privacy (PP)

From: Lee Fuller <lfuller@ipaa.org>
Sent: Monday, January 13, 2020 7:47 AM
To: Garvey, Megan <garvey.megan@epa.gov>
Subject: VoiceMail

Megan,

Sorry, I was out of the office Friday afternoon and didn't see your voicemail until this morning. Please call when you can. I will be here today and tomorrow but traveling the rest of the week with an uncertain schedule.

Lee

Message

From: Laura Nelson [lnelson@utah.gov]
Sent: 1/9/2020 11:33:36 PM
To: Aaron Averett [aaverett@sunrise-eng.com]; Adrienne Sandoval [Adrienne.Sandoval@andeavor.com]; Amy Cesspooch [amyc@utetribe.com]; Andrea Olsen [Andrea.Olsen@simplot.com]; Angela Zivkovich [Angela.Zivkovich@anadarko.com]; Ashley Korenblat [ashley@publiclandsolutions.org]; Ashley Miller [ashley@breatheutah.org]; Bill Stringer [bstringer@uintah.utah.gov]; Brian Mesinger [bmensinger@trinityconsultants.com]; Chad schlichtemeier [Chad.Schlichtemeier@anadarko.com]; Chelsea Cantrelle [chelsea.cantrelle@epenergy.com]; Chris Colclasure [CColclasure@bwenergylaw.com]; Dresser, Chris [Dresser.Chris@epa.gov]; Christopher Pennell [cpennell@utah.gov]; Beeler, Cindy [Beeler.Cindy@epa.gov]; Smith, Claudia [Smith.Claudia@epa.gov]; Bean, Clayton [bean.clayton@epa.gov]; Corey Jones [corey.jones@epenergy.com]; Daniel D. Pring [Daniel.D.Pring@andeavor.com]; Darren Brown [dbrown@tricountyhealth.com]; Dave McNeill [dmcneill@utah.gov]; Debrorah Burney-Sigman [Ex. 6 Personal Privacy (PP)]; Douglas Jordan [Douglas.Jordan@encana.com]; Erik Vernon [evernon@blm.gov]; Erin Ehrmantraut [eehrmantraut@slrconsulting.com]; Erin Oman [Eoman@altamontenergy.com]; Gregory Todd [gtodd@duchesne.utah.gov]; Huy Tran [huy.tran@usu.edu]; Jake Woodland [jwoodland@crescentpointenergy.com]; James Woodall [james.woodall@encana.com]; Jean Semborski [Jean.semborski@cop.com]; Jeremy Patterson [JPatterson@ndnlaw.com]; Jiillian Yamartino [Jillian.Yamartino@anadarko.com]; Joe Sager [joe.sager@epenergy.com]; John Baza [johnbaza@utah.gov]; John Spencer [John.Spencer@simplot.com]; Jonathan Melton [Ex. 6 Personal Privacy (PP)]; Jordan Mathis [jmathis@tricountyhealth.com]; Josh Hirschi [Jhirschi@enervest.net]; Justin Smart [jsmart@pennapowers.com]; Karen Pratt [Karen_Pratt@xtoenergy.com]; Ken Burdick [Kburdick@duchesne.utah.gov]; Laura Nelson [lnelson@utah.gov]; Levi Olsen [Lolsen@altamontenergy.com]; Lexie Wilson [lexiewilson@utah.gov]; Lonnie Favel [lonnief@utetribe.com]; Marc Mansfield [marc.mansfield@usu.edu]; Marcus Trail [MTRAIL@ramboll.com]; Marie Durrant [Marie.Durrant@pacificorp.com]; Marie Kaufusi [mariek@utetribe.com]; mberger@utah.gov; Mark Stewart [mstewart@redleafinc.com]; Garvey, Megan [garvey.megan@epa.gov]; Mike M Mckee [mmckee@7county.utah.gov]; miken@utetribe.com; minnieg@utetribe.com; Morales, Monica [Morales.Monica@epa.gov]; Nancy Daher [ndaher@utah.gov]; Nathan Hall [nhall@utah.gov]; Randy Hughes [randy.hughes@middleforkep.com]; Reed Page [Ex. 6 Personal Privacy (PP)]; Rikki Lauren Hrenko-Browning [Rhrenko-browning@utahpetroleum.org]; Rob Zaback [rob.zaback@middleforkep.com]; Robert Hammer [rhammer@slrconsulting.com]; Ryan Clerico [Ryan.Clerico@enefit.com]; Ryan Streams [Ryan@kairosaerospace.com]; Ryan Swanson [Ryan.Swanson@epenergy.com]; Scott Baird [scottbaird@utah.gov]; Scott Chew [scottchew@le.utah.gov]; Jackson, Scott [Jackson.Scott@epa.gov]; Seth Lyman [seth.lyman@usu.edu]; Sheila Vance [svance@utah.gov]; Spencer Kimball [spencer_kimball@eogresources.com]; Stephanie Howard [showard@blm.gov]; Stuart Siffring [ssiffring@westernenergyalliance.org]; Teisha Black [Teisha.Black@epenergy.com]; Thom Carter [thom@ucair.org]; Thomas H. Gibbons [Thomas.H.Gibbons@andeavor.com]; Trang Tran [trang.tran@usu.edu]; Tyler Wiseman [twiseman@utah.gov]; Tyson Todd [ttodd@utah.gov]; Val Oman [val.oman@epenergy.com]; Vince Christensen [vince.christensen@simplot.com]; Wes Adams [wesadams@utah.gov]
Subject: Transition and Next UBOWG January 22 2:00-3:30 DOGM Offices

Dear Uinta Basin Ozone Working Group.

I first want to thank all of you for your commitment and support to this work group and to providing meaningful pathways for both environmental and economic results that benefit our state and our Uinta Basin communities.

Ex. 6 Personal Privacy (PP) I remain committed to the work we are doing and do plan to facilitate our next meeting now scheduled for January 22, 2020, 2:00-3:30 at the offices of the Division of OIl Gas and Mining, 1594 West North Temple, Salt Lake City. Many thanks to John Baza for arranging the space. We will also make conferencing and presentation capabilities available. More details and a formal agenda will be forthcoming. In the interim, please feel free to contact me at [Ex. 6 Personal Privacy (PP)]

All the best,
Laura

--

Dr. Laura Nelson
Energy Advisor and
Executive Director
Governor's Office of Energy Development
Advancing Utah's Energy Future

(801) 538-8726
energy.utah.gov

GOVERNOR'S OFFICE OF
ENERGY DEVELOPMENT
Advancing Utah's Energy Future

Message

From: Lee Fuller [lfuller@ipaa.org]
Sent: 1/8/2020 3:09:07 PM
To: Garvey, Megan [garvey.megan@epa.gov]
Subject: RE: EPA's Existing Owner Clean Air Act Audit Program for Oil and Gas

Ex. 6 Personal Privacy (PP)

From: Garvey, Megan <garvey.megan@epa.gov>
Sent: Wednesday, January 8, 2020 8:17 AM
To: Lee Fuller <lfuller@ipaa.org>
Subject: RE: EPA's Existing Owner Clean Air Act Audit Program for Oil and Gas

Good morning, Lee,

Will you please send me your phone number?

Thanks, Megan

Megan E. Garvey
Senior Counselor
Ex. 6 Personal Privacy (PP)

From: Lee Fuller <lfuller@ipaa.org>
Sent: Sunday, January 5, 2020 5:25 PM
To: Garvey, Megan <garvey.megan@epa.gov>
Subject: Re: EPA's Existing Owner Clean Air Act Audit Program for Oil and Gas

Thanks Megan.

Sent from my iPhone

> On Jan 5, 2020, at 5:13 PM, Garvey, Megan <garvey.megan@epa.gov> wrote:
>
> Hi, Lee,
>
> Hope you are having a nice weekend. I understand your concerns and I heard from industry when the New Owner Audit Program was released early last year about some similar concerns. I'll give you a call early this week to chat, provide EPA's perspective and talk about a solution.
>
> Thanks, Megan
>
> Megan E. Garvey
> Senior Counselor
> Ex. 6 Personal Privacy (PP)
>
> ---
>
> **From:** Lee Fuller <lfuller@ipaa.org>
> **Sent:** Friday, January 3, 2020 11:58 AM

To: Garvey, Megan <garvey.megan@epa.gov>
Subject: RE: EPA's Existing Owner Clean Air Act Audit Program for Oil and Gas

Thanks for following up.

My main concern here relates to the issues industry had with the initial self-audit package regarding storage vessels. It is compounded by the dynamics associated with the Subpart OOOOa Reconsideration. As I understand the self-audit package, for a facility to qualify it must essentially commit to apply storage vessel controls that exceed our interpretation of the current Subpart OOOOa requirements, may be closer to the proposed Subpart OOOOa reconsideration requirements, but may differ from what may finally be included in the Subpart OOOOa reconsideration. For existing facility owners to impose such an expanded regulatory program on themselves – particularly if they are beyond what will be required for new sources in the final regulatory structure – doesn't seem to make the self-audit appealing.

It's hard for me as a trade association to suggest that this process is a value to existing owners under that scenario. Am I misreading the essentials?

Lee

From: Garvey, Megan <garvey.megan@epa.gov>
Sent: Tuesday, December 31, 2019 4:11 PM
To: Lee Fuller <lfuller@ipaa.org>
Subject: RE: EPA's Existing Owner Clean Air Act Audit Program for Oil and Gas

Talk to you then. I am also in town the week of Jan. 6 and Jan. 21 if you want to meet in person. Happy New Year.

Megan E. Garvey
Senior Counselor
Ex. 6 Personal Privacy (PP)

From: Lee Fuller <lfuller@ipaa.org>
Sent: Tuesday, December 31, 2019 2:10 PM
To: Garvey, Megan <garvey.megan@epa.gov>
Subject: Re: EPA's Existing Owner Clean Air Act Audit Program for Oil and Gas

Thanks, Megan. I'll follow up next year.

Sent from my iPhone

> On Dec 31, 2019, at 3:35 PM, Garvey, Megan <garvey.megan@epa.gov> wrote:
>
> Hi, Lee,

Sorry for my delay. The existing owner policy is very similar to the new owner policy – in that it targets excess emissions from production equipment like the new owner policy does. Happy to chat further about any concerns.

Happy new year, Megan

Megan E. Garvey
Senior Counselor
Ex. 6 Personal Privacy (PP)

From: Lee Fuller <lfuller@ipaa.org>
Sent: Monday, December 23, 2019 11:48 AM
To: Garvey, Megan <garvey.megan@epa.gov>
Subject: RE: EPA's Existing Owner Clean Air Act Audit Program for Oil and Gas

Megan,

Is this the same new owner self-audit policy applied to existing owners or does it provide some different options? As you will recall, a key issue in the self-audit policy related to it provisions on storage tanks in particular which has also been an issue with the Subpart OOOOa reconsideration.

Thanks,

Lee Fuller

From: Garvey, Megan <garvey.megan@epa.gov>
Sent: Friday, December 20, 2019 3:50 PM
To: Garvey, Megan <garvey.megan@epa.gov>
Cc: Sullivan, Tim <Sullivan.Tim@epa.gov>; Fried, Gregory <Fried.Gregory@epa.gov>; Mia, Marcia <Mia.Marcia@epa.gov>; Hull, George <Hull.George@epa.gov>
Subject: EPA's Existing Owner Clean Air Act Audit Program for Oil and Gas

Good morning, EPA stakeholders and co-regulators,

Yesterday, EPA finalized an **Existing Owner Clean Air Act Audit Program** tailored for the oil and natural gas sector. The program encourages existing owners to voluntarily find, correct and self-disclose Clean Air Act violations. The EPA believes that the program will accelerate the rate at which participating operators identify and correct emissions violations, resulting in significant pollutant reductions and increased environmental protection.

EPA's Press Release and the Oil and Natural Gas Existing Owner Audit Program Implementation Memo and Standard Agreement/Template are available here.

Please contact Gregory Fried (fried.gregory@epa.gov, Tel. 202-564-7016), Tim Sullivan (sullivan.tim@epa.gov, Tel. 303-312-6196) or me with questions.

Recall that EPA released an Audit Program for New Owners/Operators of oil and natural gas facilities earlier this year (March, 2019). Additional information regarding the New Owner/Operator program can be found here.

Please share this email with your colleagues and peers.

Thank you. Have a happy and safe holiday season, Megan

Megan E. Garvey
Senior Counselor
Office of the Administrator
U.S. Environmental Protection Agency
Work: 303.312.6192 | Cell: Ex. 6 Personal Privacy (PP)

Message

From: Dresser, Chris [Dresser.Chris@epa.gov]
Sent: 12/16/2019 7:37:14 PM
To: Rikki Hrenko-Browning [rhrenko-browning@utahpetroleum.org]; lnelson@utah.gov; miken@utetribe.com; lnelson@utah.gov; Debrorah Burney-Sigman [Ex. 6 Personal Privacy (PP)]; Robert Hammer [rhammer@slrconsulting.com]; Marc Mansfield [marc.mansfield@usu.edu]; John Baza [johnbaza@utah.gov]; James Woodall [james.woodall@encana.com]; bstringer@uintah.utah.gov; ksgamma@westernenergyalliance.org; scottchew@le.utah.gov; adrienne.sandoval@andeavor.com; Nancy Daher [ndaher@utah.gov]; john.spencer@simplot.com; kburdick@duchesne.utah.gov; aaverett@sunrise-eng.com; ryan.clerico@enefit.com; eehrmantraut@slrconsulting.com; ttodd@utah.gov; corey.jones@epenergy.com; joe.sager@epenergy.com; ashley@publiclandsolutions.org; [Ex. 6 Personal Privacy (PP)]; Lexie Wilson [lexiewilson@utah.gov]; spencer_kimball@eogresources.com; chelsea.cantrelle@epenergy.com; mberger@utah.gov; rob.zaback@middleforkep.com; huy.tran@usu.edu; mmckee@7county.utah.gov; svance@utah.gov; lonnief@utetribe.com; trang.tran@usu.edu; amyc@utetribe.com; ashley@breatheutah.org; Jordan Mathis [jmathis@tricountyhealth.com]; minnieg@utetribe.com; mariek@utetribe.com; randy.hughes@middleforkep.com; vince.christensen@simplot.com; jhirschi@enervest.net; ryan.swanson@epenergy.com; teisha.black@epenergy.com; marie.durrant@pacificorp.com; twiseman@utah.gov; chad.schlichtemeier@anadarko.com; jean.semborski@cop.com; gtodd@duchesne.utah.gov; jillian.yamartino@anadarko.com; val.oman@epenergy.com; andrea.olsen@simplot.com; mstewart@redleafinc.com; angela.zivkovich@anadarko.com; Ryan Streams [ryan@kairosaerospace.com]; ccolclasure@bwenergylaw.com; douglas.jordan@encana.com; Christopher Pennell [cpennell@utah.gov]; Dave McNeill [dmcneill@utah.gov]; evernon@blm.gov; wesadams@utah.gov; karen_pratt@xtoenergy.com; seth.lyman@usu.edu; lolsen@altamontenergy.com; eoman@altamontenergy.com; jpatterson@ndnlaw.com; nhall@utah.gov; [Ex. 6 Personal Privacy (PP)]; Darrin Brown [dbrown@tricountyhealth.com]; bmensinger@trinityconsultants.com; daniel.d.pring@andeavor.com; jwoodland@crescentpointenergy.com; thomas.h.gibbons@andeavor.com; thgibbons@marathonpetroleum.com; Scott Baird [scottbaird@utah.gov]; rbankert@blm.gov; mtrail@ramboll.com
CC: Beeler, Cindy [Beeler.Cindy@epa.gov]; Garvey, Megan [garvey.megan@epa.gov]; Bean, Clayton [bean.clayton@epa.gov]; Smith, Claudia [Smith.Claudia@epa.gov]; Morales, Monica [Morales.Monica@epa.gov]; Jackson, Scott [Jackson.Scott@epa.gov]; Daly, Carl [Daly.Carl@epa.gov]; Boydston, Michael [Boydston.Michael@epa.gov]; Fallon, Gail [fallon.gail@epa.gov]; Sethuraman, Jag [Sethuraman.Jag@epa.gov]
Subject: SIGNED: Proposed Federal Implementation Plan for Managing Emissions from Oil and Natural Gas Sources on Indian Country Lands Within the Uintah and Ouray Indian Reservation in Utah

Good Afternoon.

Today the EPA Region 8 Administrator signed the proposed rule entitled, "**Federal Implementation Plan for Managing Emissions from Oil and Natural Gas Sources on Indian Country Lands Within the Uintah and Ouray Indian Reservation in Utah (SAN 5872.1)**."

This proposed rule would control emissions from new, modified, and existing oil and natural gas facilities on the Uintah & Ouray (U&O) Indian Reservation to address air quality in the Uinta Basin Ozone Nonattainment Area in northeast Utah. The proposed FIP would also continue the streamlined approach to authorize new and modified minor oil and natural gas production sources on the Reservation.

This proposed U&O FIP will: (1) establish emissions control requirements for oil and natural gas activity that contribute to the Uinta Basin's winter ozone problem; (2) establish regulatory requirements that are the same or consistent between Indian country and neighboring jurisdictions within the Basin; and (3) allow for reasonable continued development of the Basin's oil and natural gas resources on the Indian country lands within the U&O Reservation that are included in the current Uinta Basin Ozone Nonattainment Area.

VOC emissions control requirements for existing oil and natural gas sources are currently required in areas of the Basin under Utah jurisdiction, but do not exist for most sources on the U&O Reservation. Additionally, this proposed U&O FIP will ensure new development on the U&O Reservation will not cause or contribute to a violation of the 2015 ozone

National Ambient Air Quality Standards. We designed this proposed U&O FIP to protect air quality while also providing the regulated community certainty that requirements will be consistent across the Uinta Basin and allow for continued, responsible development of new and modified minor oil and natural gas sources. Unless and until replaced by a Tribal Implementation Plan, this proposed U&O FIP will be implemented by the EPA, or by the Ute Indian Tribe if the EPA delegates that authority to the Tribe.

More information, including the signed pre-publication version of the proposed rule, is available at: https://www.epa.gov/air-quality-implementation-plans/proposed-fip-oil-and-natural-gas-sources-uintah-and-ouray-indian

EPA Region 8 will be hosting an informational webinar presentation on the proposed rule via Skype on **December 19, 2019, at 9:00 a.m. MT**. Information for joining the webinar is included below:

Join Skype Meeting

Trouble Joining? Try Skype Web App

Join by phone

Toll number: +Ex. 6 Personal Privacy (PP)

Note: If dialing in by phone instead of using Skype audio, be sure to mute your Skype and computer speakers to avoid feedback.

Chris Dresser
U.S. EPA – Region 8
1595 Wynkoop Street
Denver, Colorado 80202-1129
Phone: (303) 312-6385

Message

From: Mike Natchees [MikeN@utetribe.com]
Sent: 12/9/2019 9:59:37 PM
To: Laura Nelson [lnelson@utah.gov]; Aaron Averett [aaverett@sunrise-eng.com]; Adrienne Sandoval [Adrienne.Sandoval@andeavor.com]; Amy Cesspooch [AmyC@utetribe.com]; Andrea Olsen [Andrea.Olsen@simplot.com]; Angela Zivkovich [Angela.Zivkovich@anadarko.com]; Ashley Korenblat [ashley@publiclandsolutions.org]; Ashley Miller [ashley@breatheutah.org]; Bill Stringer [bstringer@uintah.utah.gov]; Brian Mesinger [bmensinger@trinityconsultants.com]; Chad schlichtemeier [Chad.Schlichtemeier@anadarko.com]; Chelsea Cantrelle [chelsea.cantrelle@epenergy.com]; Chris Colclasure [CColclasure@bwenergylaw.com]; Dresser, Chris [Dresser.Chris@epa.gov]; Christopher Pennell [cpennell@utah.gov]; Beeler, Cindy [Beeler.Cindy@epa.gov]; Smith, Claudia [Smith.Claudia@epa.gov]; Bean, Clayton [bean.clayton@epa.gov]; Corey Jones [corey.jones@epenergy.com]; Daniel D. Pring [Daniel.D.Pring@andeavor.com]; Darren Brown [dbrown@tricountyhealth.com]; Dave McNeill [dmcneill@utah.gov]; Debrorah Burney-Sigman [Ex. 6 Personal Privacy (PP)]; Douglas Jordan [Douglas.Jordan@encana.com]; Erik Vernon [evernon@blm.gov]; Erin Ehrmantraut [eehrmantraut@slrconsulting.com]; Erin Oman [Eoman@altamontenergy.com]; Gregory Todd [gtodd@duchesne.utah.gov]; Huy Tran [huy.tran@usu.edu]; Jake Woodland [jwoodland@crescentpointenergy.com]; James Woodall [james.woodall@encana.com]; Jean Semborski [Jean.semborski@cop.com]; Jeremy Patterson [JPatterson@ndnlaw.com]; Jiillian Yamartino [Jillian.Yamartino@anadarko.com]; Joe Sager [joe.sager@epenergy.com]; John Baza [johnbaza@utah.gov]; John Spencer [John.Spencer@simplot.com]; Jonathan Melton [Ex. 6 Personal Privacy (PP)]; Jordan Mathis [jmathis@tricountyhealth.com]; Josh Hirschi [Jhirschi@enervest.net]; Karen Pratt [Karen_Pratt@xtoenergy.com]; Ken Burdick [Kburdick@duchesne.utah.gov]; Levi Olsen [Lolsen@altamontenergy.com]; Lexie Wilson [lexiewilson@utah.gov]; Lonnie Favel [lonnief@utetribe.com]; Marc Mansfield [marc.mansfield@usu.edu]; Marcus Trail [MTRAIL@ramboll.com]; Marie Durrant [Marie.Durrant@pacificorp.com]; Marie Kaufusi [mariek@utetribe.com]; mberger@utah.gov; Mark Stewart [mstewart@redleafinc.com]; Garvey, Megan [garvey.megan@epa.gov]; Mike M Mckee [mmckee@7county.utah.gov]; minnieg@utetribe.com; Morales, Monica [Morales.Monica@epa.gov]; Nancy Daher [ndaher@utah.gov]; Nathan Hall [nhall@utah.gov]; Randy Hughes [randy.hughes@middleforkep.com]; Reed Page [Ex. 6 Personal Privacy (PP)]; Rikki Lauren Hrenko-Browning [Rhrenko-browning@utahpetroleum.org]; Rob Zaback [rob.zaback@middleforkep.com]; Robert Hammer [rhammer@slrconsulting.com]; Ryan Clerico [Ryan.Clerico@enefit.com]; Ryan Streams [Ryan@kairosaerospace.com]; Ryan Swanson [Ryan.Swanson@epenergy.com]; Scott Baird [scottbaird@utah.gov]; Scott Chew [scottchew@le.utah.gov]; Jackson, Scott [Jackson.Scott@epa.gov]; Seth Lyman [seth.lyman@usu.edu]; Sheila Vance [svance@utah.gov]; Spencer Kimball [spencer_kimball@eogresources.com]; Stuart Siffring [ssiffring@westernenergyalliance.org]; Teisha Black [Teisha.Black@epenergy.com]; Thomas H. Gibbons [Thomas.H.Gibbons@andeavor.com]; Trang Tran [trang.tran@usu.edu]; Tyler Wiseman [twiseman@utah.gov]; Tyson Todd [ttodd@utah.gov]; Val Oman [val.oman@epenergy.com]; Vince Christensen [vince.christensen@simplot.com]; Wes Adams [wesadams@utah.gov]
CC: Trena Sligting [tsligting@utah.gov]
Subject: UBOWG Meeting Location

Good afternoon everyone,

This is to confirm the location for the UBOWG meeting to be held this Wednesday (12/11/19). The meeting will be held at the Ute Indian Tribe Auditorium.

The address listed is 6964 East 1000 South Fort Duchesne Utah, 84026.
However, when that address is put into Google Maps, it shows a totally different location.
This is the correct lat long that you can put into Google Maps and it will give you the right location.
40.282769, -109.869149

You can also use this link to show the location,

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If you need further directions, please do not hesitate to contact me at (435) 725-4974 or you can reach me on my cell at Ex. 6 Personal Privacy (PP)

Mike Natchees
Director
Ute Indian Tribe Air Quality
(435) 725-4974

From: Laura Nelson [mailto:lnelson@utah.gov]
Sent: Thursday, December 5, 2019 4:15 PM
To: Aaron Averett <aaverett@sunrise-eng.com>; Adrienne Sandoval <Adrienne.Sandoval@andeavor.com>; Amy Cesspooch <AmyC@utetribe.com>; Andrea Olsen <Andrea.Olsen@simplot.com>; Angela Zivkovich <Angela.Zivkovich@anadarko.com>; Ashley Korenblat <ashley@publiclandsolutions.org>; Ashley Miller <ashley@breatheutah.org>; Bill Stringer <bstringer@uintah.utah.gov>; Brian Mesinger <bmensinger@trinityconsultants.com>; Chad schlichtemeier <Chad.Schlichtemeier@anadarko.com>; Chelsea Cantrelle <chelsea.cantrelle@epenergy.com>; Chris Colclasure <CColclasure@bwenergylaw.com>; Chris Dresser <dresser.chris@epa.gov>; Christopher Pennell <cpennell@utah.gov>; Cindy Beeler <Beeler.Cindy@epa.gov>; Claudia Smith <smith.claudia@epa.gov>; Clayton Bean <bean.clayton@epa.gov>; Corey Jones <corey.jones@epenergy.com>; Daniel D. Pring <Daniel.D.Pring@andeavor.com>; Darren Brown <dbrown@tricountyhealth.com>; Dave McNeill <dmcneill@utah.gov>; Debrorah Burney-Sigman < Ex. 6 Personal Privacy (PP) >; Douglas Jordan <Douglas.Jordan@encana.com>; Erik Vernon <evernon@blm.gov>; Erin Ehrmantraut <eehrmantraut@slrconsulting.com>; Erin Oman <Eoman@altamontenergy.com>; Gregory Todd <gtodd@duchesne.utah.gov>; Huy Tran <huy.tran@usu.edu>; Jake Woodland <jwoodland@crescentpointenergy.com>; James Woodall <james.woodall@encana.com>; Jean Semborski <Jean.semborski@cop.com>; Jeremy Patterson <JPatterson@ndnlaw.com>; Jiillian Yamartino <Jillian.Yamartino@anadarko.com>; Joe Sager <joe.sager@epenergy.com>; John Baza <johnbaza@utah.gov>; John Spencer <John.Spencer@simplot.com>; Jonathan Melton < Ex. 6 Personal Privacy (PP) >; Jordan Mathis <jmathis@tricountyhealth.com>; Josh Hirschi <Jhirschi@enervest.net>; Karen Pratt <Karen_Pratt@xtoenergy.com>; Ken Burdick <Kburdick@duchesne.utah.gov>; Laura Nelson <lnelson@utah.gov>; Levi Olsen <Lolsen@altamontenergy.com>; Lexie Wilson <lexiewilson@utah.gov>; Lonnie Favel <lonnief@utetribe.com>; Marc Mansfield <marc.mansfield@usu.edu>; Marcus Trail <MTRAIL@ramboll.com>; Marie Durrant <Marie.Durrant@pacificorp.com>; Marie Kaufusi <mariek@utetribe.com>; Mark Berger <mberger@utah.gov>; Mark Stewart <mstewart@redleafinc.com>; Megan Garvey <garvey.megan@epa.gov>; Mike M Mckee <mmckee@7county.utah.gov>; Mike Natchees <MikeN@utetribe.com>; Minnie Grant <minnieg@utetribe.com>; monica Morales <morales.monica@epa.gov>; Nancy Daher <ndaher@utah.gov>; Nathan Hall <nhall@utah.gov>; Randy Hughes <randy.hughes@middleforkep.com>; Reed Page Ex. 6 Personal Privacy (PP) ; Rikki Lauren Hrenko-Browning <Rhrenko-browning@utahpetroleum.org>; Rob Zaback <rob.zaback@middleforkep.com>; Robert Hammer <rhammer@slrconsulting.com>; Ryan Clerico <Ryan.Clerico@enefit.com>; Ryan Streams <Ryan@kairosaerospace.com>; Ryan Swanson <Ryan.Swanson@epenergy.com>; Scott Baird <scottbaird@utah.gov>; Scott Chew <scottchew@le.utah.gov>; Scott Jackson <jackson.scott@epa.gov>; Seth Lyman <seth.lyman@usu.edu>; Sheila Vance <svance@utah.gov>; Spencer Kimball <spencer_kimball@eogresources.com>; Stuart Siffring <ssiffring@westernenergyalliance.org>; Teisha Black <Teisha.Black@epenergy.com>; Thomas H. Gibbons <Thomas.H.Gibbons@andeavor.com>; Trang Tran <trang.tran@usu.edu>; Tyler Wiseman <twiseman@utah.gov>; Tyson Todd <ttodd@utah.gov>; Val Oman <val.oman@epenergy.com>; Vince Christensen <vince.christensen@simplot.com>; Wes Adams <wesadams@utah.gov>
Cc: Trena Sligting <tsligting@utah.gov>
Subject: Reminder to RSVP for UBOWG

Hello,

This a reminder that the Uintah Basin Ozone Working Group meeting will take place on Dec 11th at the Ute Indian Tribe Tribal Administration Building (Tribal Office) 6964 E 1000 S (2 miles south of Bottle Hollow) Fort Duchesne Utah 84026.

A draft agenda for the meeting has been attached. Please note that Chris Colclasure will be presenting for the ERC portion on the agenda. I have also attached the link for the Annual Report below.

A lunch will be provided for those attending in person so make sure you RSVP to tsligting@utah.gov as soon as possible.

Best Regards,
Laura Nelson

Annual Report link: https://usu.box.com/s/co626elackqkw9ead14wkma14jjv9eng.

--
Dr. Laura Nelson
Energy Advisor and
Executive Director
Governor's Office of Energy Development
Advancing Utah's Energy Future

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GOVERNOR'S OFFICE OF
ENERGY DEVELOPMENT
Advancing Utah's Energy Future

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Message

From: Kern, Gretchen [Gretchen.Kern@pxd.com]
Sent: 10/8/2019 10:53:12 PM
To: Garvey, Megan [garvey.megan@epa.gov]
CC: Stuart Siffring [ssiffring@westernenergyalliance.org]; Sanchez, Jessica M. (MRO) [jmsanchez@marathonoil.com]; Lee Fuller [lfuller@ipaa.org]; Jagadeesan Sethuraman [Jagadeesan.Sethuraman@whiting.com]
Subject: RE: [External] - Re: Meeting on the proposed NSPS OOOOa Technical Rule
Attachments: EPA Alt. Work Practice to Detect Leaks_Final Rule_12_22_08.pdf; CANGET_METEC White Paper.pdf; AMEL emg. tech for IPAA_EPA Policy Meeting_07_16_19.docx; AlternativeComplianceReport FINAL.pdf

Megan,

It was so nice talking with you today! I wish I could have been there in person. I know we all definitely appreciate your time and attention to our issues with this rulemaking!

I have attached a few items for your review:

1) **EPA's M21/OGI AWP Final Rule dated 12/22/08 – I highlighted/starred relevant sections; pg. 78201 has most important points**
2) EDF's Pathway to Equivalency paper (see pgs. 17-20 specifically)
3) CSU's Methane Emissions Tech. Evaluation Center (METEC) brief overview paper
4) My AMEL/Emg. Tech. talking points document you received today

The first item is the document you requested and I have included these others for your easy reference.

Also, to answer your question again, a basin-wide approval would definitely be preferable. Since we didn't feel we were getting positive feedback from RTP on a basin-wide approval approach for the rule, a few members from API and I drafted this "range of equipment and geographic boundaries" language so that there would be flexibility for EPA to determine the appropriate scope for each approval. The ultimate goal is to not be locked into site by site approval - we feel that many technologies could not show equivalency and further, it would result in a paperwork/administrative burden for both operators and the EPA.

One last point forgot to mention - although some technologies in the future may be as sensitive as OGI and could potentially show eq. on a site level (RTP has said they believe this could be the case), these technologies may not reduce the burden enough on the operator from a cost and manpower perspective to proceed with a lengthy 111(h) notice and comment process to get a site level technology approved. And more cost effective and less man-power intensive technologies would inevitably lose out. There are more details in Pioneer's and API and IPAA's AMEL section in their comments.

Please let me know if you would like to chat further and/or if you have any questions!

Thanks so much! Gretchen

GRETCHEN C. KERN
Sr. Environmental Policy Advisor
Sustainable Development

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PIONEER
NATURAL RESOURCES

From: Garvey, Megan <garvey.megan@epa.gov>
Sent: Tuesday, October 01, 2019 3:38 PM
To: Jagadeesan Sethuraman <Jagadeesan.Sethuraman@whiting.com>
Cc: Kern, Gretchen <Gretchen.Kern@pxd.com>; Stuart Siffring <ssiffring@westernenergyalliance.org>; Sanchez, Jessica M. (MRO) <jmsanchez@marathonoil.com>; Lee Fuller <lfuller@ipaa.org>
Subject: [External] - Re: Meeting on the proposed NSPS OOOOa Technical Rule

CAUTION - EXTERNAL SENDER

Hi, Jag,

Thank you for the email and invitation to meet. I am available next Tuesday at 1p. Look forward to the conversation.

Megan

Sent from my iPhone

On Oct 1, 2019, at 8:49 AM, Jagadeesan Sethuraman <Jagadeesan.Sethuraman@whiting.com> wrote:

> Good morning Megan,
>
> Western Energy Alliance, Independent Petroleum Association of America, and American Exploration and Production Council members would like to meet with you to discuss the industry's comments for the proposed NSPS OOOOa Technical Rule. The purpose of this meeting is to review and explain the comments these trades have submitted on this proposed rule. An agenda for the meeting is attached. Our members are available next Tuesday (10/08) at 1:00 P.M. and we hope that this schedule works for you. Please let me know if we need to reschedule this meeting for any reason. We are proposing to meet at the Western Energy Alliance's office. We would appreciate it if you can check your availability and let us at your earliest convenience so that we can let our members know of this meeting.
>
> Thanks,
>
> **Jagadeesan Sethuraman**
> Environmental Manager
> **Whiting Petroleum Corporation**
> ***and its wholly owned subsidiary***
> **Whiting Oil and Gas Corporation**
> 1700 Broadway, Suite 2300
> Denver, CO 80290
> Direct (303) 390-4986
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<Joint Trades and EPA NSPS OOOOa Tech Agenda.docx>

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PATHWAYS FOR ALTERNATIVE COMPLIANCE

A Framework to Advance Innovation, Environmental Protection, and Prosperity

Environmental Defense Fund &
Environmental Council of the States
Shale Gas Caucus

April 2019

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Acknowledgements
Lucy Cheadle, Carrie Crumpton, Joe Dawley, Kate Fay, Dave Glatt, Michael Hopkins, Ying Hsu, Matthew Kolesar, Kathleen Kozawa, Leah Martland, Patrick McDonnell, Brad Morello, Jim Nolan, Jim Nyarady, Todd Parfitt, Lia Parisien, Drew Pomerantz, Arvind Ravikumar, Dirk Richter, Martha Rudolph, Tim Taylor, Erin Tullos, Dan Zimmerle

Environmental Defense Fund
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Photos: Sean Boggs, John Davidson, Leslie VonPless

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Executive summary

Leak detection and repair is a pressing concern for the oil and gas industry, as leaks profoundly undermine the industry's claim for part of the future energy mix. Companies are concerned about lost product, current and future regulations, and the impact on their reputations. State and federal authorities worry about damage to public health, climate change implications, and lost revenue. Innovators see a potential new market in solving all of these problems. Unfortunately, although the past couple of years have shown significant creativity in leak detection and repair strategies, many new technologies have stalled just past the pilot stage.

The challenge

The increasing pace of technological change poses both a challenge and an opportunity.

- Innovators and industry have said that lack of a pathway for approval of new methods as compliance tools for leak detection and repair is the single biggest barrier to investing in and deploying new solutions. Without a pathway for approval of new methods, innovation can slow or even stop once a regulatory mandate is established, with the result that best practice is frozen. For potential entrepreneurs serving the oil and gas industry, demonstrating approval as a compliance device, or at least a pathway to approval, is essential to securing the scarce resources that turn an idea into a commercial offering. A nonexistent, multi-year, or uncertain approval process may lock in legacy technologies, and inhibit operators from lowering the cost of compliance over time.

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- For regulators, the broad and constantly changing array of potential new solutions can be daunting. They may question the quality of the data put forward by innovators, and lack the capacity to evaluate complex technologies and methods. Each regulator would need to match its ideal policy outcome with its legal authority, and engage other stakeholders such as local implementing and enforcing agencies, as appropriate.

The opportunity

Resolving these questions is necessary in order to to unleash the potential of innovation to achieve environmental protection and advance economic prosperity. There is uncommonly strong agreement among environmentalists, regulators, innovators, and operators that alternative compliance pathways are needed. Many new and different leak detection and repair solutions are already advertising themselves, and the pipeline of future innovation could be strong. All agree about the need to achieve environmental protection and economic growth at the lowest possible cost, because:

- Better technologies can achieve regulatory goals faster and at lower cost, and enable easier monitoring.
- Operators can lower their cost of compliance, report more effectively, and earn greater flexibility.
- Innovators can bring the best of the sensor and data revolution to solve environmental and business challenges.

This is a three-part report. The research questions were determined in collaboration with the Environmental Council of the States Shale Gas Caucus, and industry representatives, technology innovators, environmentalists, and federal regulators.

Lessons learned

We review applicable policies in six states and a rule promulgated by the U.S. Environmental Protection Agency (EPA). Colorado and EPA are the only jurisdictions with an express and existing pathway for the approval of alternatives. The experience with these constructive attempts offers lessons learned for those and other jurisdictions.

- The first and most important question raised by all stakeholders was how to demonstrate equivalency between the regulatory mandate and new methodologies. It is difficult to assess new techniques against the percentage reductions in emissions projected as the impact of current best practice. This pronounced difficulty is due to the shift from close-range technologies used on a fixed schedule to continuous or mobile approaches deployed over broader space and time.
- The process for approvals, even with recent revisions, is still considered too uncertain and slow by some. To promote confidence in the system, concerns about privacy need to be balanced with the goals of transparency and opportunity for public input.
- The consequences of an approval, for example on obligations to

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inspect and report, can make a significant difference in the value of an approval, and therefore the incentive for operators and innovators to create new solutions in the first place. Stakeholders questioned how broadly an approval extends—one site at one operator, multiple sites of one operator, or even multiple similar sites and sources from different operators.

- Demand for innovation is also influenced by whether there is an off-ramp for the old approach, once a new methodology is approved, and whether new reporting and monitoring strategies may adapt to take advantage of technology capabilities. Many new digital technologies could allow operators to report more easily and more precisely on their own emissions, and give regulators faster and easier insights.
- Finally, the fact that an approval in one state may not advance an application in another jurisdiction dramatically reduces the potential market for innovation and discourages investment.

Evaluation Framework

We define a mathematical, technology-neutral framework for comparing emission reductions of different practices. It is important to note that the framework, and this report in general, concern methodologies, not technologies. The approach that reduces the most emissions in a given circumstance may combine different technologies used at different times and for different purposes. Even for one technology, the mitigation actions that the information triggers determine the emissions impact, not the technology specifications.

Recommendations

This evaluation framework can be applied in a regulatory process and as a tool to facilitate interjurisdictional collaboration:

- States and federal agencies can adopt the same model for evaluation of equivalency in leak detection and repair methodologies. Agencies can make their default approvable ranges for critical model inputs public, and even if they have different ranges, this still gives innovators and operators clearer goalposts for performance.
- A transparent and rapid process is also essential to encourage innovation and maintain public confidence.
- Allowing approved methodologies to be used as broadly as scientifically justified, providing an off-ramp for the status quo best practice, and allowing modified reporting and monitoring would all encourage innovation without sacrificing environmental impact.
- Finally, jurisdictions can collaborate to take advantage of the work done in prior assessments, increasing the potential market for new solutions and therefore encouraging investment in better leak detection and repair.

At heart, a regulatory framework that encourages innovation takes advantage of the fact that technology makes it faster and cheaper to understand the world, and creative methods using these new technologies can enable better detection, mitigation, and monitoring to reduce waste and protect the environment.

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Regulatory context

EPA and Colorado have promulgated rules that allow for approval of novel leak detection methods. Since these two rules form the basis of established best practice, and experience with those rules has revealed opportunities for improvement, we summarize these rules in detail below. Other states with leak detection and repair requirements on oil and gas are also summarized.

EPA

In 2016 EPA finalized a rule that requires broad reductions in volatile organic compounds (VOCs) and methane from a suite of oil and gas equipment.[1] A key element of this rule is a requirement that oil and gas operators inspect for leaks at well sites, gas processing plants, and compressor stations. This "fugitive emissions monitoring" provision requires the use of either an optical gas imaging camera (OGI) or a Method 21 device.[2] Alternatively, owners or operators of well sites and compressors,[3] or, in the case of gas processing plants,[4] manufacturers, may apply to EPA for approval to use another means to conduct these inspections.

EPA's fugitive emissions monitoring requirement is a work practice standard. The Clean Air Act (CAA) authorizes EPA to establish work practice standards instead of standards of performance where "it is not feasible to prescribe or enforce a standard of performance."[5] The CAA further authorizes EPA to approve of alternative work practice standards provided that such standards "will achieve a reduction in emissions of any air pollutant at least equivalent to the reduction in emissions of such air pollutant achieved" under the required work practice standard.[6] Accordingly, any alternative method for

[1] Envt'l Protection Agency, Oil and Natural Gas Sector: Emission Standards for New, Reconstructed, and Modified Sources, 81 Fed. Reg. 35824, 35861 (June 3, 2016) (final rule).
[2] 40 C.F.R. §§ 60.5397a(c)(2).
[3] 40 C.F.R. §§ 60.5398a(c), 60.5402a(c).
[4] Id. at § 60.5402a(c).
[5] 42 U.S.C. § 7411(h)(1).
[6] 42 U.S.C. § 7411(h)(3).

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conducting fugitive emissions monitoring must achieve at least equivalent emissions reductions as inspections conducted using OGI or a Method 21 device.

Per EPA's 2016 rule, operators wishing to use an alternative fugitive emissions monitoring method must provide detailed information in order to demonstrate that the alternative qualifies as an alternative work practice standard.

First, the applicant must collect, verify, and submit 12 months of test data in its application.[7] This is the information upon which EPA relies in order to determine equivalency. In addition, the applicant must provide detailed information related to the alternative method. This information includes, but is not limited to, a description of the technology or process,[8] initial and ongoing quality assurance/quality control measures,[9] field data verifying viability and detection capabilities of the technology or process,[10] operation and maintenance procedures,[11] restrictions for using the technology or process,[12] and initial and continuous compliance procedures, including recordkeeping and reporting.[13]

All applications for alternative fugitive emissions monitoring are subject to public notice, hearing and comment.[14] As of August 2018, no applications had been made public. The rule does not provide a deadline by which EPA must publish an application for comment or make a final determination. In the final rule, EPA noted that it "intends" to publish a complete application within six months of receipt[15] and that it "intends" to make a final determination within six months after the the public comment period closes.[16] EPA's final determination[17] is published in the Federal Register along with the grounds for the determination. EPA may attach conditions of approval to an alternative work practice standard as necessary to ensure it meets the requirements of the rule and the CAA.[18]

Colorado

In 2014, Colorado became the first U.S. jurisdiction to promulgate a rule requiring comprehensive and robust reductions in methane from a suite of oil and gas equipment and facilities.[19] A hallmark provision of this rule is the requirement that operators inspect for leaks at various intervals, including quarterly and monthly.[20] The inspection interval is tied to production capability; larger-producing sites are subject to more frequent inspections. Per the rule, operators may use either an infrared camera, Method 21, or an alternative approved instrument monitoring method (AIMM) or program (alternative AIMM).[21] The 2014 alternative AIMM provision applied to well production facilities and compressor stations in the gathering and boosting segment of the natural gas

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[7] 40 C.F.R. at §§ 60.5398a(d)(1), 60.5402a(d)(1).
[8] Id. at §§ 60.5398a(d)(1)(i), 60.5402a(d)(2)(i).
[9] Id. at §§ 60.5398a(d)(1)(v), 60.5402a(d)(2)(v).
[10] Id. at §§ 60.5398a(d)(1)(vii), 60.5402a(d)(2)(vii).
[11] Id. at §§ 60.5398a(d)(1)(xi), 60.5402a(d)(2).
[12] Id. at §§ 60.5398a(d)(1)(x), 60.5402a(d)(2)(x).
[13] Id. at §§ 60.5398a(d)(1)(xii), 60.5402a(d)(3).
[14] Id. at § 60.5398a(b), (e); § 60.5402a(b); 81 Fed. Reg. at 35861.
[15] Id. at § 60.5398a(b), (e); § 60.5402a(b); 81 Fed. Reg. at 35851.
[16] Id. at § 60.5398a(e); 81 Fed. Reg. at 35861.
[17] Id.
[18] Id. at § 60.5398a(f)(2).
[19] CDPHE, Alternative AIMM Guidance and Procedures, p. 1 (May 31, 2018) (accessible at https://drive.google.com/file/d/1reFIFX_DVI_Wcu82853NNekmhjOtljui/view); see generally AQCC Reg. 7.
[20] AQCC Reg. 7, §§ XVII.F.3.c, XVII.F.4.b, XVIIIF.2.a, XVIII.F.2.b.
[21] AQCC Reg. 7, § XVII.A.2.

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supply chain in the state. Owners or operators who opt to use a continuous emission monitoring system may apply to the Air Pollution Control Division (Division) for approval of a streamlined inspection, recordkeeping, and reporting program.[22]

While the 2014 rule allowed for the use of alternative AIMM, the rule provided no criteria to guide the approval process. Rather, the Division provided information related to the approval process, including the type of information applicants wishing to use alternative AIMM must supply to the Division, in a guidance document.

In terms of approval criteria, Colorado's alternative AIMM rule requires that an alternative AIMM be able to demonstrate that it is capable of achieving emission reductions that are at least as effective as the emissions reduction achieved using an infrared (IR) camera or EPA Reference Method 21.[23] In addition, the proposed alternative must be commercially available.[24] Applicants must provide detailed information on the alternative technology or method, including but not limited to, its limitations, the process for recordkeeping, whether it has been approved of for other applications or by other regulators, and any modeling results or test data.[25] Applicants must describe where they propose to use the alternative method. Information about weather may be relevant to any limitations or restrictions in use of the alternative and must be provided if this is the case.

Colorado allows manufacturers of alternative AIMM as well as operators to apply to gain approval for an alternative AIMM. Once approved, an AIMM may be used by any operator in Colorado to comply with well production facility and compressor station LDAR inspections, and operators may cease using the prior work practice. In addition, approved AIMM may be used to conduct inspections of pneumatic controllers in the Denver nonattainment area.[26] Since 2014 Colorado has approved two alternative AIMM: the Pixel Velocity Automated Hydrocarbon Leak Detection System and the Rebellion Photonics Gas Cloud Imager.[27] Pixel submitted its application for approval of its continuous emission monitoring system on May 31, 2016. After it had email and phone conversations and received supplemental information, the Division approved Pixel's application slightly under one year later, on May 17, 2017. The Division attached nine conditions of approval, including that an owner or operator wishing to use Pixel's monitoring system may apply for a streamlined recordkeeping and reporting program.[28]

In 2017 Colorado made revisions to its state implementation plan (SIP) for ozone. The CAA requires that SIPs and SIP elements be subject to EPA approval and public notice and comment.[29] When Colorado added the alternative AIMM provision to its SIP, it made the alternative AIMM federally enforceable. Accordingly, applications to use an alternative AIMM in the Denver ozone nonattainment area are subject to public notice and comment and an EPA approval process in addition to approval by the Division.[30] Due to stakeholder concerns about potential delays in EPA approval, the rule specifies that the Division will consider EPA inaction on an application after six months to constitute approval.[31] Applicants wishing to use an alternative AIMM outside of the ozone nonattainment area do not need to comply with the new notice and comment procedures, nor obtain EPA approval. The same approval criteria and informational requirements apply to applicants wishing to use an alternative AIMM in the ozone nonattainment areas and to those wishing to use an alternative AIMM outside of the nonattainment area.

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[22] Id.

[23] Id. at § XII.L.8.a(ii)(I); CDPHE, Alternative AIMM Guidance and Procedures, p. 1 (May 31, 2018) (accessible at https://drive.google.com/file/d/1reFIFX_DVI_Wcu82853NNekmhjOtljui/view).

[24] Id. at § XII.L.8.a(ii)(B); Alternative AIMM Guidance and Procedures, p. 2.

[25] Id. at § XII.L.8.a(i); Alternative AIMM Guidance and Procedures, p. 1.

[26] Alternative AIMM Guidance and Procedures, p. 1.

[27] Letter from Jennifer Mattox, CDPHE, to Robert Kester, Rebellion Photonics (Jan. 15, 2015) (accessible at https://www.colorado.gov/pacific/sites/default/files/AP-BusIndGuidance-AIMMapprovalRebellion.pdf); Letter from Jennifer Mattox, CDPHE, to Heather Grisham, Pixel Velocity (May 17, 2017) (accessible at https://www.colorado.gov/pacific/sites/default/files/AP-BusIndGuidance2-AIMMapproval_Pixel_Velocity.pdf).

[28] Letter from Jennifer Mattox to Heather Grisham.

[29] 42 U.S.C. § 7410.

[30] AQCC Reg. 7, § XII.L.8.

[31] Id. at § XII.L.8.a.(v).[32] PADEP, Gen. Plan Approval and/or Gen. Operating Permit BAQ-GPA/GP-5 (March 2018) (accessible at http://www.depgreenport.state.pa.us/elibrary/GetDocument?docId=12967&DocName=FINAL%20DRAFT%20GP-5%20-%20NATURAL%20GAS%20COMPRES SION%20STATIONS%2C%20PROCESSING%20PLANTS%2C%20AND%20TRANSMISSION%20STATIONS.PDF%20%20%3Cspan%20 style%3D%22color%3Ablue%3B%22%3E%3C%2Fspan%3E); PDEP, Gen. Plan Approval and/or Gen. Operating Permit BAQ-GPA/GP-5A (June 2018) (accessible at http://www.depgreenport.state.pa.us/elibrary/GetDocument?docId=19615&DocName=02%20GP-5A%20UNCONVENTIONAL%20NATURAL%20GAS%20WELL%20SITE%20OPERATIONS%20AND%20REMOTE%20PIGGING%20STATIONS%20 GENERAL%20PLAN%20APPROVAL%20AND/OR%20GENERAL%20OPERATING%20PERMIT.PDF%20%20%3Cspan%20style%3D%22color:blue%3b%22%3E%28NEW%29%3C/span%3E).

Pennsylvania

The Pennsylvania Department of Environmental Protection (PADEP) recently finalized two General Permits that require operators to reduce methane, VOC, and hazardous air pollutant emissions from a suite of equipment found at well sites, pigging stations, gas processing plants, and compressor stations.[32] A key elements of these permits is a requirement that operators inspect for leaks on a quarterly basis. Operators of well sites and pigging operations may reduce the inspection frequency based on the percentage of leaking components detected over time. Operators may use an OGI camera, EPA Method 21, or an approved alternative.[33]

Any operator wishing to use the General Permits to authorize construction of a well site, compressor station, or gas processing may apply to use an alternative approved device for the purposes of conducting leak detection and repair (LDAR) inspections. However, it is not clear what the approval process would look like. Unlike Colorado and EPA, Pennsylvania has yet to develop a clear approval pathway; there is no rule governing the approval of alternative technologies or methods and PADEP has not issued any guidance materials. PADEP is currently working on developing guidance materials to provide criteria and informational requirements that will govern the alternative LDAR methods and technology approval process for new sources using the General Permits.

PADEP is also developing a separate rule that will require emission reductions from existing sources, including sources of fugitive emissions.[34] PADEP has broad authority to allow for the use of alternative LDAR methodologies. Pursuant to the Air Pollution Control Act, PADEP can "require the owner or operator of any air contamination source to install, use and maintain such air contaminant monitoring equipment or methods as the department may reasonably prescribe" and to "require the owner or operator of any air contamination source to sample the emissions thereof in accordance with such methods and procedures and at such locations and intervals of time as the department may reasonably prescribe and to provide the department with the results thereof."[35] Accordingly, when PADEP proposes a rule to require LDAR inspections at existing sources, it may include a robust compliance approval pathway for emerging methodologies.

Wyoming

Wyoming requires operators to inspect for leaks of VOCs on a quarterly basis at new and existing well sites in the Upper Green River Basin (UGRB) ozone nonattainment area if fugitive VOC emissions are equal to or greater than 4 TPY; otherwise semiannual monitoring is required. Semiannual monitoring is required for new and modified well sites in

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[33] Gen. Plan Approval and/or Gen. Operating Permit BAQ-GPA/GP-5, p. 17; Gen. Plan Approval and/or Gen. Operating Permit BAQ-GPA/GP-5A, p. 18.

[34] PADEP, A Pa. Framework of Actions for Methane Reductions from the Oil and Gas Sector, p. 3 (Jan. 19, 2016) (accessible at http://files.dep.state.pa.us/Air/AirQuality/AQPortalFiles/Methane/DEP%20Methane%20Strategy%201-19-2016%20PDF.pdf).

[35] 35 P.S. § 4004(5),(6).

all other areas of the state. Quarterly inspections are also required for existing compressor stations in the basin, and for new and modified compressor stations in the basin and in all other areas of the state.[36] Operators of existing sites in the UGRB may use either OGI, Method 21, audio-visual-olfactory (AVO) inspections, other instrument-based technologies, or some combination of the above.[37] Operators of new and modified sites in the UGRB and the rest of the state are required to use optical gas imaging, Method 21, or an EPA-approved alternative method.[38]

In 2018, Wyoming updated its Oil and Gas Permitting Guidance to reflect that Wyoming will allow use of EPA-approved alternative fugitive emissions monitoring methods. Accordingly, applicants wishing to use an alternative method must demonstrate that it is an EPA-approved method. The Wyoming Department of Environmental Quality has yet to receive an application to use any alternative fugitive emissions monitoring technology or methods.[39]

Ohio

Ohio requires operators to conduct LDAR inspections at well sites and compressor stations. In Ohio, all control requirements must demonstrate Best Available Technology (BAT).[40] The Ohio EPA has determined that LDAR conducted with either a Forward Looking Infrared Camera or Method 21 is the current BAT. Pursuant to two General Permits, operators must use one of these two methods.[41] Because neither General Permit includes a provision allowing for the use of alternatives, operators must apply for an individual permit for each facility where the operator wishes to use the alternative method. An alternative LDAR would need to demonstrate that it constitutes BAT.[42]

A request to use an alternative LDAR as part of an individual permit application is noticed.[43] The public has an opportunity to request a hearing on the permit and may submit comments at the hearing or in writing.[44] The issuance or denial of a permit is a final agency action and can be appealed.[45] Ohio has yet to receive a request to use a non-standard LDAR approach.

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[36] Wyo. Air Quality Standards & Regs. Ch. 8, § 6(g)(i); WDEQ, Oil and Gas Prod. Facilities Chap. 6, Sec. 2 Permitting Guidance, pgs. 13, 16, 22 (December 2018) (accessible at http://deq.wyoming.gov/media/attachments/Air%20Quality/New%20Source%20Review/Guidance%20Documents/FINAL_2018_Oil%20and%20Gas%20Guidance.pdf; see also OOOOa as published in 81 Fed. Reg. 35824-35941 (June 3, 2016).

[37] Wyo. Air Quality Standards & Regs, Ch. 8, § 6(g)(i)

[38] WDEQ, Oil and Gas Prod. Facilities, Chap. 6, Sec 2, Permitting Guidance, pgs 13, 16, 22; WDEQ, Response to Comments, pg 5 (Response 11) and pg 8 (Response 1) (December 2018) (accessible at http://deq.wyoming.gov/media/attachments/Air%20Quality/New%20Source%20Review/Guidance%20Documents/FINAL_2018%20Response%20to%20Comments.pdf

[39] Email correspondence from Josh Nall, NSR Permitting Supervisor, Wyo. Dept. of Envt'l Quality (Apr. 30, 2018).

[40] OAC 3745-31-05(A)(3).

[41] Ohio EPA, General Permit 12.1 Template, pp. 42-46 (accessible at https://epa.ohio.gov/Portals/27/oil%20and%20gas/GP12.1_PTIOA20140403final.pdf); Ohio EPA, General Permit 18.1 Template, p. 5 (accessible at http://epa.ohio.gov/Portals/27/genpermit/GP18.1_TVF20170223.pdf).

[42] Id. (for permit approval, facility must employ BAT); See also Ohio. R.C. § 3704.03(T)(Requiring new and modified sources install BAT, with some exceptions).

[43] OAC 3745-31-29(D), 3745-31-06(H); Email correspondence from Mike Hopkins.

[44] Id. at 3745-31-06(H).

[45] Id. at 3745-31-29(D)(1), (D)(4); Email correspondence from Mike Hopkins.

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For Ohio to facilitate alternative LDAR methods at new sources, it would need to revise its General Permits to specifically allow for the use of alternative methods. This would require a public notice and comment period, but not a rulemaking.[46] In order to allow for the use of alternative methods at existing sources, Ohio would need to promulgate a new rule. In practice, Ohio would also need to enable applications that encompass more than one facility.

California

The California Air Resources Board (CARB) finalized a comprehensive rule in 2017 that regulates methane from a suite of equipment at new and existing, upstream and midstream facilities.[47] The rule includes an LDAR provision that requires operators to conduct quarterly inspections at well sites, gas processing plants, natural gas storage facilities, and compressor stations using Method 21.[48]

While the rule does not allow for the use of alternative methods to conduct LDAR inspections at this time, CARB has acknowledged that it may revise its rule in the future to do so. Specifically, in response to comments suggesting that CARB allow for the use of alternatives, CARB noted:

> [C]ARB staff has also been in close contact with a number of instrument manufacturers, some of which have been developing newer instruments or newer types of technologies to speed up testing or provide for automated measurements. Throughout implementation of the regulation, staff plans to continue working with instrument manufacturers and perform studies to evaluate the effectiveness of these newer instruments or technologies, and to determine how they compare with Method 21. Given the results of these studies, staff may find a need to make future modifications to the regulation to allow for the use of these instruments.[49]

We identified no statutory barriers to CARB including a provision in its rule that allows for the approval of alternative LDAR technologies. Indeed, such a provision would be in line with the legislature's intent to "invest in the development of innovative and pioneering technologies"[50] in order to help California meet its GHG reduction goals and consistent with California's demonstrated leadership in implementing a suite of measures, including regulations and market-based compliance measures, to tackle climate change.

A change to the rule allowing for the use of alternative LDAR methods in addition to Method 21 would require CARB approval and be subject to public notice and comment.[51]

In addition, in order to ensure early detection of large leaks, such as the one that occurred from the Aliso Canyon storage facility in 2016, owners and operators of underground natural gas storage facilities must install continuous air monitoring to measure upwind and downwind ambient concentrations of methane and conduct daily screenings or continuous leak screenings at each injection/withdrawal wellhead assembly and attached pipelines.[52] Daily screenings may be conducted using Method 21, OGI, or "other natural gas leak screening instruments approved by the [C]ARB Executive Officer."[53] These daily screenings are separate from the quarterly LDAR Method 21 inspections, as screenings are limited to injection/withdrawal wellhead assembly and attached pipelines and are intended to "pinpoint a blowout or large leak at the well head assemblies," whereas LDAR inspections apply to other equipment at a facility "such as separator and tank systems, natural gas compressors, and other piping systems or components."[54] The daily or continuous monitoring requirement specifically allows for alternative compliance applications, although no specific guidance has been issued.

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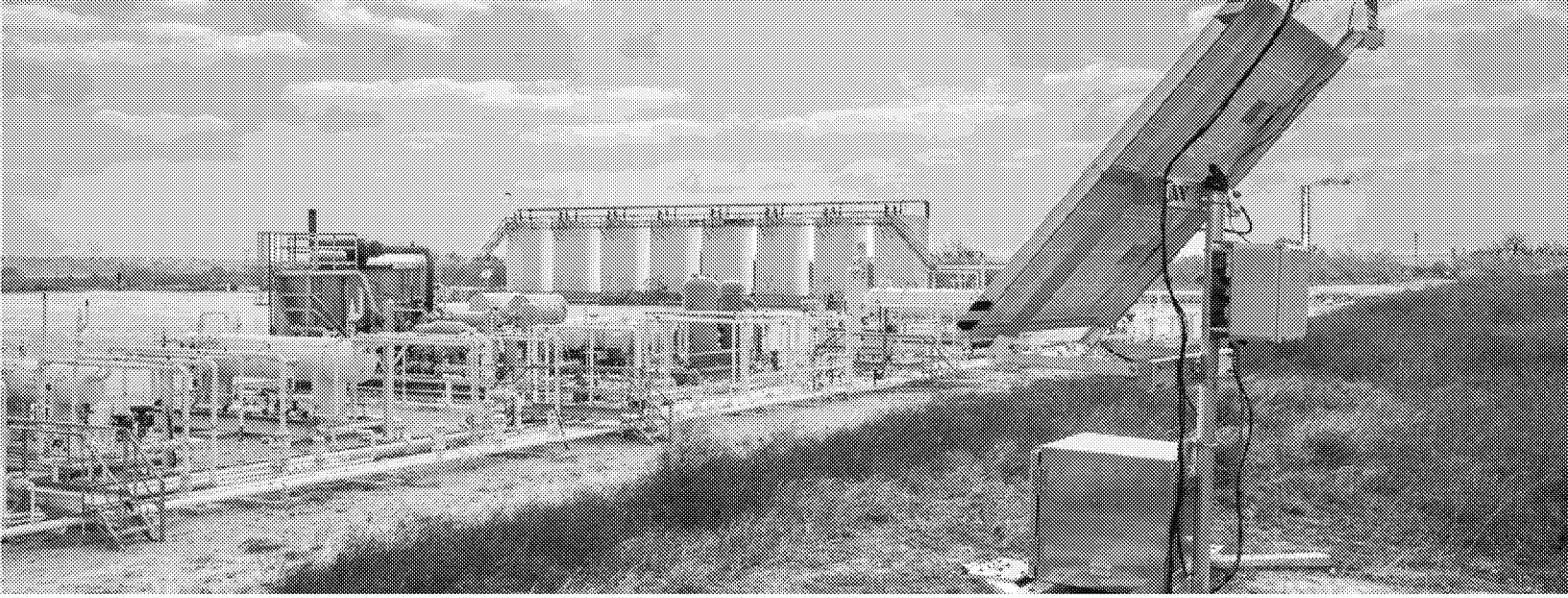
[46] Id. at 3745-31-06(H).
[47] 17 C.C.R. § 95665 et seq. (2017).
[48] Id. at § 95669(g).
[49] Id. at 106.
[50] West's Ann.Cal.Health & Safety Code § 38501(e).
[51] West's Ann.Cal.Health & Safety Code § 38500 et seq.
[52] Id. at § 95668(h)(5)(A), (h)(5)(B).
[53] Id. at § 95668(h).
[54] State of Cal. Air Res. Bd., Final Stmt. of Reasons, Reg. for Greenhouse Gas Emission Standards for Crude Oil and Natural Gas Facilities, p. 76 (May 2017) (accessible at https://www.arb.ca.gov/regact/2016/oilandgas2016/ogfsor.pdf).



Demonstrating equivalency over space and time

The primary question raised by stakeholders regarding approval of alternative methodologies concerned how to demonstrate equivalency. As of now, the question can only be asked of the Colorado and EPA rules, since these are the only two with clear and detailed approval pathways. The risk for regulators is that uncertainty regarding how to determine equivalency prompts the reviewing agency to reject an application, or even dissuade applicants in the first place. The risk for an operator or innovator is both that the proposed solution will not be approved, and that it will be approved, but the standards for approval will be so lax that the proposed solution will be underbid by less scrupulous competitors. This risk essentially dissuades innovators and operators from investing in the development of new solutions.

"The first step in determining equivalency is to understand: equivalent to what?"

The first step in determining equivalency is to understand: equivalent to what? In the final technical support document accompanying the adoption of its LDAR requirements, EPA determined that semi-annual inspections using OGI will reduce leaks by 60%.[55] For compressor stations, EPA determined an 80% reduction.[56] In coming to this conclusion, EPA considered the required inspection frequency, size of leaks detectable using both types of technology, and anticipated emissions reductions associated with repairs.

Colorado undertook essentially the same methodology in estimating anticipated emission reductions associated with its tiered LDAR requirements. The Division estimated that monthly inspections can reduce leak emissions by 80%, quarterly inspections can reduce such emissions by 60%, and semi-annual inspections can reduce emissions by 40%.[57] The Division assumed that Method 21 inspections were equally as effective in reducing leaks as IR camera inspections.[58]

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[55] U.S. EPA, Oil and Natural Gas Sector: Emission Standards for New, Reconstructed, and Modified Sources, Background Tech. Supp. Doc. for the Final NSPS, 40 CFR Part 60, subpart OOOOa, p. 41 (May 2016) (accessible at https://www.regulations.gov/document?D=EPA-HQ-OAR-2010-0505-7631).

[56] TSD at p. 49.

[57] Regulatory Analysis for Proposed Revisions to Colorado Air Quality Control Commission Regulation Numbers 3, 6 and 7 (February 11, 2014) (accessible at file:///C:/Users/anowlan/Downloads/RegulatoryAnalysisAttachment2013-01217.PDF)

[58] Id.

These statements of efficacy of OGI and Method 21 form the most detailed information available to operators or innovators interested in demonstrating the effectiveness of their proposed alternative methodologies. Prospective applicants must aim to demonstrate equivalent or greater reductions—40%, 60%, or 80%, according to the frequency and the target facility of the LDAR they seek to replace.

Feedback from stakeholders indicates that it is very difficult to assess leak detection methodologies and arrive at a metric of reductions required by these percentage targets. Public data are lacking about the size and timing of leaks to be expected for different kind of facilities or equipment—the base case scenario that any alternative would be compared against. It is also currently expensive and onerous to quantify methane emissions in the field. As a result, both the status quo and proposed impact of new methodologies are difficult to assess and compare.

For operators wishing to obtain approval for an alternative AIMM in Colorado, demonstrating equivalency appears even less clear. Colorado approvals apply to any facility, and the type of LDAR program required for each facility differs depending on type and production capability (or, in the case of compressor stations, capacity). Accordingly, an applicant wishing to obtain approval for an alternative AIMM may not know if the alternative must demonstrate a 40% or a 60% reduction in emissions. In addition, as Colorado and EPA estimate different emissions reductions from the same LDAR frequency, equivalency becomes even more complex.

The differences in the types of leak inspection methods being developed and the manner in which they can be deployed to identify leaks poses a challenge to the goal of developing and evaluating alternative LDAR methods. EPA and state LDAR requirements all prescribe the use of certain leak inspection technologies (e.g., infrared cameras) and the manner in which such technologies must be used (e.g., four times a year at one facility). The effectiveness of these LDAR requirements in reducing emissions is predicated on assumptions regarding the efficacy of the combination of the technology and the frequency of inspections, as well as assumptions regarding the efficacy of repairs. Emerging LDAR methods often are predicated on different types of technologies (e.g., lasers rather than optical gas imaging devices) and are deployed in a different manner (e.g., continuously at one location, or over broad geographies at great frequency). This poses a challenge to regulators attempting to compare anticipated emission reductions from very different types of technologies and leak detection methods.

Most traditional leak detection methods involve very close-range, individual evaluations of particular equipment, repeated on a fixed schedule. New continuous and mobile solutions cover larger geographic areas or are deployed over a longer period of time, or both. For example, mobile-based technologies affixed to a plane or vehicle are capable of inspecting multiple facilities a day, whereas a human holding a handheld device may only be able to get to one or two facilities per day. Continuous monitors can prompt a repair when a leak is detected, which nearly eliminates the time a leak continues unabated, and therefore dramatically reduces the associated emissions. The best methods likely combine instruments, for example by using an instrument with a high detection threshold to prompt a survey by a more sensitive handheld instrument. Independent test data used as inputs for sophisticated modeling can enable comparison of alternative methodologies that take advantage of the capabilities of new technologies and ways to combine them over space and time. However, regulators and operators both point to the time and expertise required to evaluate potential methodologies and model emissions reductions; little staff capacity exists for these new and important roles.

Process concerns and barriers

A number of stakeholders have raised questions regarding procedural elements of the approval of alternative leak detection methods. Questions of particular concern involve how much of an application will be public and whether regulators can assist applicants. The ideal balance here combines protection of business information to the minimum extent necessary, with transparency and opportunities for public comment, to maintain confidence in the system and ensure the environmental protection goals are being met.

In Colorado, whether an application to use an alternative LDAR approach is subject to public notice and comment depends on whether or not the alternative will be used solely outside the ozone nonattainment area. Alternatives that will be used solely outside the ozone nonattainment area are not

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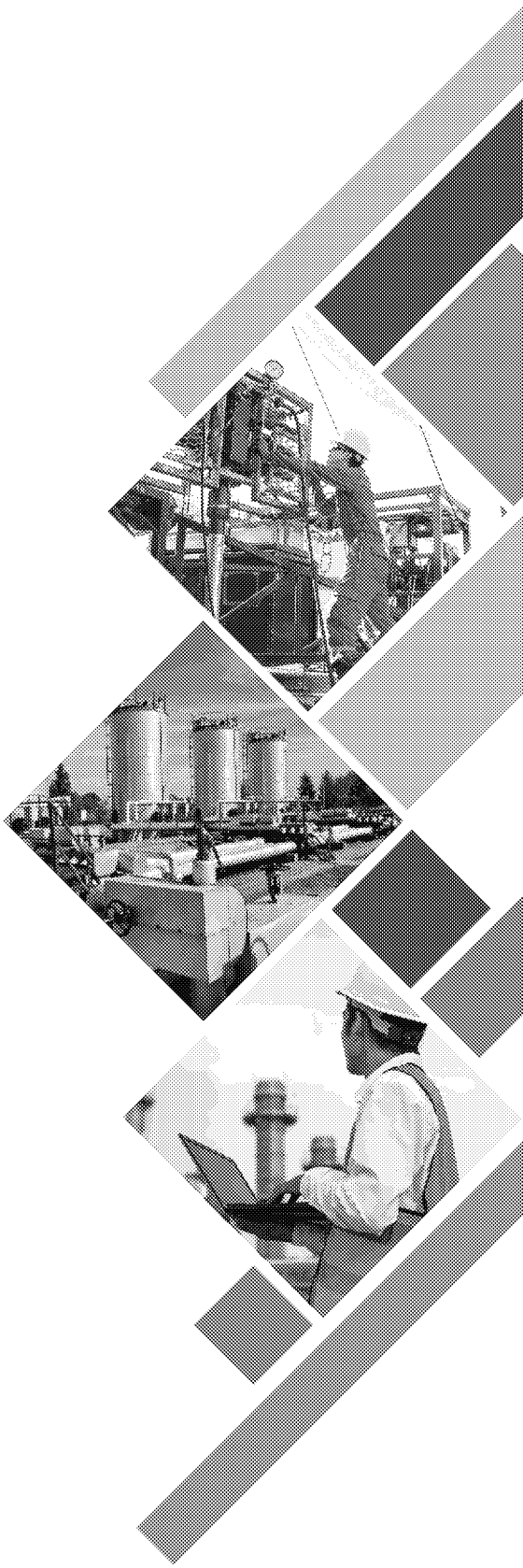
made public.[59] By contrast, applications to use an alternative LDAR method in the ozone nonattainment area are subject to notice and comment procedures.[60] For such applications, all of the application, the Colorado Air Pollution Control Division's preliminary analysis, and the draft permit to be filed are public and subject to public comment.[61] Applicants can request that portions of an application remain confidential under the Division's confidential business information policy. Applicants must mark any information as "confidential business information." Information so marked will not be posted publicly on the Division's website.[62] The Colorado rule does not contain appeal procedures, so it is unclear whether or not a CDPHE or EPA approval decision, or failure to make a decision, may be appealed.

Stakeholders have also requested information regarding whether regulators interact with potential applicants. The Division can and does interact with potential applicants. In the case of the approval of the Pixel LDS, the Division corresponded with the applicant via conference call and e-mail four times following the applicant's original application.[63]

EPA also makes applications for alternative work practices public. EPA must publish the application, accept public comment, and publish its final determination including reasons for the denial or approval. EPA's decision with respect to an application to use an alternative work practice standard constitutes final agency action.[64] Accordingly, pursuant to the CAA, applicants may appeal the decision.[65]



Use of an approved method

The question of how broadly an approved alternative may be employed has significant implications for the market for that alternative, and consequently, the investment an innovator or operator will likely make in developing an alternative. On the other hand, a regulator is concerned with ensuring that an alternative is employed only in circumstances where the data support that equivalent reductions can be expected. For states that operate via permits at each facility, there may be structural limitations to approving an alternative methodology for multiple operators or facilities in one decision.

In Colorado, the approval is for a technology or a method — not for an individual operator or facility.[66] Accordingly, an approved method can be used by any operator of a non-Title V facility. Operators of Title V facilities must be specified within each Title V operating permit, and an operator of a Title V facility must first request a modification or revision to its permit before being able to use an alternative AIMM.[67]

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[59] Alternative AIMM Guidance and Procedures, p. 7.
[60] AQCC Reg. § 7.XII.L.8.a(iv).
[61] AQCC Reg. § 3 Part B.III.C.4.
[62] CDPHE, Alternative AIMM Public Notices (accessible at https://www.colorado.gov/pacific/cdphe/air/alternative-aimm-public-notices).
[63] Letter from Jennifer Mattox to Heather Grisham, p. 1.
[64] 42 U.S.C. § 7607(b)(1).
[65] Id.
[66] Alternative AIMM Guidance and Procedures, p. 8.
[67] CDPHE, Approved Instrument Monitoring Method (AIMM) for Oil and Gas (accessible at https://www.colorado.gov/pacific/cdphe/AIMM).

Under the EPA rule, an approval of an alternative means of emissions limitation constitutes a required work practice, equipment, design or operational standard within the meaning of 42 U.S.C. 7411(h).[68] The 111h standards, once adopted, are treated as standards of performance.[69] Standards of performance apply to sources, not individual facilities.[70] Accordingly, although not explicitly stated it would appear that once EPA approves an alternative it may be used at any source, not just by the owner or operator of a particular facility or group of facilities that applied.

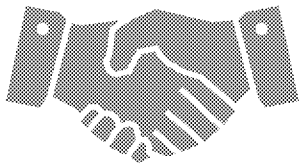
Consequences for recordkeeping, reporting and monitoring

Many stakeholders indicated that new technologies can change the way recordkeeping and reporting is done. Many new technologies send data electronically to analytics databases and dashboards. A significant area of shared interest would be to take advantage of capabilities of new technologies to reduce the recordkeeping and reporting burden on operators and improve transparency to regulators. For example, in Colorado, approved continuous monitoring AIMMs are eligible for approval of a streamlined inspection, recordkeeping, and reporting program.[71]

Some stakeholders have expressed concern regarding how a regulator would enforce an alternative LDAR provision. For example, during the rule development in California, CARB considered allowing operators to use optical gas imaging cameras in addition to Method 21 devices. Local air districts, which are responsible for implementing the regulation, expressed concern regarding enforcement of non-quantitative leak detection methods. Local air districts currently have rules requiring the inspection and repair of VOC leaks using Method 21 only. Concerns about enforceability ultimately resulted in California not including a pathway for alternative compliance methodologies, despite stakeholder requests that it do so.

Regulator and implementing agency (if different from the regulator) comfort with the enforceability of new methodologies is therefore an important aspect to consider when advocating for a rule that allows alternative applications, and in the context of individual applications when the rules permit them. This is another area where the capabilities of new technologies, deployed creatively, could be used to build consensus between operators, innovators and regulators. For example, ongoing monitoring or verification, such as continuous monitoring at a representative subset of facilities, could give both regulators and operators much-needed data to demonstrate that new methodologies are working and offer opportunities for improvements if results do not live up to expectations.

Reciprocity with other jurisdictions



Given the time and effort required for approval in one jurisdiction, and the fact that oil and gas operations are spread across the country and around the world, reciprocity between jurisdictions offers a powerful tool to build the market, encourage innovation, and reduce the burden on any one regulator. Already in Colorado, approval by other jurisdictions or use for other purposes (such as pipeline leak monitoring) is a factor the Division considers when reviewing alternative AIMM applications.[72] However, approval by other jurisdictions or use for other purposes is not per se grounds for approval. Other state regulators also indicated that they would consider approvals granted by other regulators as relevant information when assessing alternative LDAR methods to be used for compliance with state rules. The technology comparison framework below, and recommendations concerning a shared model, are intended to facilitate this interjurisdictional collaboration.

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[68] 40 C.F.R. § 60.5398a(f)(2).

[69] 42 U.S.C. § 7411 (h)(5) (providing that "[A]ny design, equipment, work practice, or operational standard, or any combination thereof, described in this subsection shall be treated as a standard of performance for purposes of the provisions of this chapter (other than the provisions of subsection (a) of this section and this subsection.")

[70] Id. at § 7411(b)(1)(B)(providing that standards of performance for new sources within such category).

[71] Id. at §§ XII.B.3, XVII.A.2.

[72] Id. at §§ XII.B.3, XVII.A.2.

Technology comparison framework

In this section, we describe a technology comparison framework that provides a clear, transparent, and scientifically rigorous approach to compare diverse leak detection methods based on their estimated emission reductions. In summary, the framework uses a combination of empirical data and standardized assumptions to model the impact of leak detection methods and associated repair protocols on aggregate emissions from a population of facilities. The framework adheres to several principles:

1. **Technologies are assessed as part of an LDAR protocol.** Leak detection technologies do not reduce emissions alone but instead provide stakeholders with data that informs mitigation. In order to estimate emission reductions, it is necessary to determine both which emission sources are detected and the mitigation actions that are triggered when emissions are detected. For example, some detected emissions may be intentional, vented sources or judged too small to cost-effectively repair. The evaluation process must include a clear protocol that describes how data provided by the technology lead to actions to mitigate those emissions, including decisions about which sources to repair and the time required between detection and mitigation.

2. **Emission reductions are determined in aggregate.** O&G emission sources have highly skewed distributions at both the component- and site-level, with the top 5% highest emitting sources typically accounting for over half of the total emissions from that source.[73] Many of these high emitting sources are

"Leak detection technologies do not reduce emissions alone but instead provide stakeholders with data that informs mitigation."

[73] Adam Brandt, Garvin Heath, and Daniel Cooley, 50 Environ. Sci. Technol. 22, 12512-12520 (2016).

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stochastic,[74] and therefore leak detection technologies likely will be deployed across a population of sites that can include a relatively small but shifting subpopulation of super-emitters. A consequence of this skewed distribution is that technologies with higher detection limits may yield equivalent or greater emission reductions than low detection limit technologies if used in a fashion that leads to quicker detection and mitigation of high emitting sources. However, this equivalency only holds if emission reductions are compared in the aggregate, such as the annual emission reductions from all of an operator's well pads in a basin. A few sites will likely account for the bulk of emissions, but it is impossible (thus far) to predict in advance where super-emitters will occur. As a result, a regulator must assess a method over a group of sites and a period of time. Otherwise, high detection limit, fast-response technologies will appear less effective at relatively low-emission sites but much more effective in the super-emitter sub-population compared to a lower detection limit, low frequency approach such as semi-annual OGI. If there are regulatory constraints that require emission reductions to be assessed at the facility level, then an alternative but mathematically similar approach could be to compare reductions at model sites with a probabilistic emissions profile representing a larger population.

"A multi-step process may be required to accurately assess the probability of leak detection."

3. **Empirical data are used to assess the probability of leak detection.**
The initial phase of estimating emission reductions is to determine the minimum detection limit of a technology. For most technologies, the detection limit will not be a single value but a function of parameters such as wind speed and distance from source. This is especially true for systems that use dispersion modeling or other algorithms to infer emission rates from ambient concentrations, as this relationship is highly dependent on meteorological conditions.

A multi-step process may be required to accurately assess the probability of leak detection. First, laboratory testing can evaluate the accuracy, precision, and stability of methane concentration sensors that are a key component of some technologies. These highly controlled tests can gauge sensor performance at measuring methane concentrations under variable conditions such as temperature, relative humidity, and potential cross-sensitive gases.[75] Next, controlled field experiments can be used to determine the probability of detecting different emission rates under a range of known conditions. For example, a Stanford team[76] determined the relationship of detection probability, emission rate, and view distance for OGI by assessing the ability of an OGI camera operator to detect a series of controlled releases

[74] Aerial Surveys of Elevated Hydrocarbon Emissions from Oil and Gas Production Sites, David R. Lyon et al., 50 Environ. Sci. Technol. 9, 4877-4886 (2016)
[75] Environmental Defense Fund Methane Detectors Challenge (accessible at http://business.edf.org/projects/featured/natural-gas/methane-detectors-challenge)
[76] Arvind Ravikumar et al., "Good versus Good Enough?" Empirical Tests of Methane Leak Detection Sensitivity of a Commercial Infrared Camera, 52 Environ. Sci. Technol. 4, 2368-2374 (2018).

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at the Methane Emissions Technology Evaluation Center (METEC) at Colorado State University. Moving forward, METEC or facilities like it could play an important role as a respected, independent source for empirical assessments of methane detection methodologies. Ideally, testing should be performed repeatedly under diverse conditions representing the full range that may be encountered in actual use, but in reality this may be difficult to achieve due to the rarity of some meteorological conditions. At a minimum, it is important to challenge technologies with potentially adverse conditions such as extreme heat and cold, stagnant and high winds, and precipitation events. For technologies with well-understood physical principles, physics-based modeling could be used to augment empirical testing by predicting performance under untested conditions.[77]

4. **Standardized models are used to predict emission reductions.** Once there is sufficient empirical data to understand the probability of leak detection under diverse conditions, computer modeling can be used to predict emission reductions from use of the method as part of an LDAR protocol. Models are necessary because the skewed emission rate distribution of O&G facilities means that empirical testing will not fully characterize the impact of a technology across a population of sites. If tests were performed at low-emission sites, then results would be biased towards technologies with the lowest detection limits, while technologies with the shortest detection time would be favored by tests at high emission sites. Theoretically, empirical testing could be performed at a large number of facilities that are statistically representative of the full population, but this likely would be cost prohibitive and require widespread deployment of a technology prior to approval as a valid alternative. Therefore, a rigorous, transparent model is the most cost-effective and quickest approach for predicting emission reductions from leak detection technologies and associated repair protocols. The most likely form of these models is a probabilistic simulation of source-level emissions on a large scale (e.g., the full population of well pads in a state or basin) that uses clearly defined functions and assumptions to predict the detection and mitigation of emissions.

   A rigorous model requires three components to accurately predict reductions: a function defining the probability of detection, a representative emissions profile of the population, and a function defining mitigation in response to detection. The detection function is the direct result of empirical testing and associated physics-based modeling discussed in the previous principle. For any set of valid conditions, the function should return the probability of detection; this function could include a time element since some technologies may use algorithms that have increasing probability to detect leaks as more data are collected. The second

[77] Chandler Kemp, Arvind Ravikumar, and Adam Brandt, Comparing Natural Gas Leakage Detection Technologies Using an Open-Source "Virtual Gas Field" Simulator, 50 Environ. Sci. Technol. 8 4546-4553 (2016)

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component is a quantitative description of emission sources in the population, including their emission rate, source type (as it relates to mitigation), and probability of occurring at a site; this may also include a time component describing the frequency and duration of intermittent emission sources. The third component is a quantitative description of the mitigation response to detected emission sources, which should be based on the repair protocol associated with the technology. For each source type, the emission rate that triggers action to eliminate or reduce emissions from the source should be defined. The temporal aspect is particularly important for this component because the value of high detection limit technologies is dependent on how quickly large emission sources are mitigated. For some approaches, this may be a multi-step process: a technology that detects a high emission rate may trigger a follow-up survey by another technology such as OGI. Therefore, the mitigation response must include the time to initial detection, follow up detection, and repair. The standardization of the second and third components will be discussed in the final principle.

5. **Model inputs are transparent and rely on best available data**
   Although models are necessary for a cost-effective, timely comparison of methodologies, they can be misused if model inputs are chosen to produce a particular result rather than an objective comparison. Requiring model assumptions to be transparent and scientifically justified can minimize this risk. When possible, inputs such as emission rate distributions should be based on empirical, representative data. For example, if technologies are being compared for their effectiveness in a single state or province, then measurement data collected in that jurisdiction may be most appropriate. In many cases, there may be insufficient data from a specific area, so models will need to use best available data compiled from multiple sources across many areas. To assure consistency across comparisons, it will be advantageous to develop standardized datasets and assumptions to use when more localized data are lacking. For some data parameters, such as emission rate distributions, there is an abundance of publically available data, but other parameters, such as leak recurrence, are either sparse or not in the public domain. The ability to fairly compare technologies can be greatly enhanced by developing open, representative datasets for key model parameters. One approach would be to use an independent party to collect and aggregate data from multiple operators; this would assure the scientific rigor of inputs without revealing sensitive business information. These standardized datasets, which could be regularly updated as new data are available, would improve the transparency and consistency of technology comparisons.

"Requiring model assumptions to be transparent and scientifically justified can minimize this risk."

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Recommendations

The first step to encouraging innovation is setting out a rule that permits alternative compliance methodologies and issuing detailed guidance for those who would use the rule. The rule and associated guidance should include guidance on field testing requirements, the approved technology comparison model, submission requirements, and the process for obtaining approval of alternative methodologies. For states that already allow for the use of alternative methodologies, either by rule or general permit, but have not included all of these elements in the alternative compliance provision, only a guidance document may be required rather than a rule or rule revision.

One helpful aspect of the rule and associated guidance should be a clarification that testing a new methodology does not trigger other regulatory requirements. For example, an alert from a novel system should not trigger the requirement to fix a leak or report a leak. The method is by definition in the process of being validated, so it is not yet clear that the alert is accurate. And the risk of triggering mitigation, reporting, and other requirements can deter testing of new methodologies in the most important locations—active oil and gas facilities.

Adopt a shared model for equivalency

The backbone of a methane rule enabling alternative compliance methodologies should be a model that applicants can employ to justify their claim to equal or greater emissions reductions using the proposed methodology. The Technology Comparison Framework section above

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explains why measurement and modeling must be combined to demonstrate potential impact, how such a model would work, what it can accomplish, and its limitations. A jurisdiction should set out in advance the default assumptions on key variables in the model that it considers reasonable. Approving a model in advance and articulating approvable ranges of values can provide a framework for innovators and operators to direct their thinking as they design new methodologies. Setting approved default ranges for key assumptions encourages innovation because it sets goalposts for innovation and increases the likelihood that an application within bounds will be approved. This reduced uncertainty makes it easier to justify the significant time and energy required to develop and test new methane reduction methodologies.

Comparing the impacts of different methods is a complex exercise, and ozone compliance planning provides a useful example. EPA and states routinely rely on modeling to assess the impact of proposed controls on various goals such as the ability of states to meet national ambient air quality standards for ozone and the amount of anticipated emission reductions from a particular regulatory strategy. Ozone models are capable of accounting for a suite of factors that affect control effectiveness, including meteorology, the fate and transport of ozone precursors, and the source and regional contribution of a specific air contaminant.

The Fugitive Emissions Abatement Simulation Testbed (FEAST) model developed at Stanford is an example of a rigorous model that could be used to evaluate a wide range of technologies.[78] The open-source, field-level model uses a probabilistic Markov model to simulate which components in a field are leaking with emission rates drawn from existing, empirical datasets. Several different functions are used to determine the probability of detection; for example: 1) Gaussian dispersion modeling to predict detection by distributed methane concentration sensors, and 2) physics-based modeling to predict detection by OGI. Additional functions are used to model the rates at which detected emission sources are repaired and new leaks occur. The model outputs emission reductions over time from each technology's LDAR protocol, plus cost-effectiveness if the inputs include valid cost assumptions. For data elements that are sparse, operators, regulators, and facilities such as METEC can collaborate to fill in the gaps. Operators have an incentive to be forthcoming with data they may otherwise consider private if it is a constructive step toward gaining more flexibility in leak detection and mitigation.

Transparent and rapid process

In order to encourage innovation in methane management, a process that is transparent and fast is just as important as clear submissions guidelines. An alternative compliance rule and associated guidance should lay out the process for approvals, including the opportunities for public comment. Approving the model for evaluating methodologies in advance should facilitate faster and more predictable decision-making on individual applications.

An innovation-encouraging process should include:

- A streamlined **timeline** for decisions;
- A mechanism for applications to be made by operators, technology innovators, and **other interested parties**;
- Opportunities for **public notice and comment**;
- A mechanism to submit information and request it to be **kept out of the public domain** based on legitimate confidentiality concerns;
- A mechanism to submit **one application for multiple sites** (especially relevant in states such as Ohio that operate via individual permits);
- A **public decision**.

Key elements to require in submissions include:

- **Testing results**, preferably independent or verified by a third party;
- **Details of the proposed methodology**, including which instruments will be used where for fixed systems, or with what frequency for mobile systems, and what the mitigation response will be. The submission should also specify how the method combines different instruments—for example, a leak alert from a fixed or mobile monitor triggers a follow-up scan with a more sensitive hand-held instrument
- **Conditions and facilities** where the methodology is proposed to be deployed;

[78] C.E. Kemp, A.P. Ravikumar, and A.R. Brandt, FEAST: Fugitive Emissions Abatement Simulation Toolkit (2016) (accessible at https://eao.stanford.edu/research-areas/FEAST).

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- **Modeling** that justifies the claim to equal or greater emissions reductions, including any divergence of inputs from pre-approved ranges;
- Proposed **reporting** and **monitoring** procedures, if different from status quo procedures;
- A proposed **phaseout** of existing detection, monitoring, and reporting requirements

Approvals with powerful benefits

The consequences of an approval, designed well and spelled out in advance, can also encourage time and money to be directed to methane innovation and improve the regulator's ability to accomplish environmental goals.

For **regulators**, approved methodologies can improve the ability to monitor operating conditions and enforce the rules. One opportunity that strengthens a regulator is the ability to adapt reporting requirements to take advantage of the capabilities of new technologies. Many new technologies stream data real-time or employ advanced analytics. Regulators who streamline reporting directly from the systems that operators are already using could see dramatically improved transparency at much lower cost. Regulators can also take advantage of more effective monitoring opportunities. An alternative methodology can combine novel instruments in creative ways. A proposal could include, for example, continuous monitoring at a representative sample of locations for a trial period in order to demonstrate to a regulator that the new method is working and identify opportunities for improvements.

For **innovators**, one regulatory element that expands the potential market is the ability of follow-on operators to use an alternative methodology once it is approved. For similar conditions and similar facilities, a follow-on operator should be able to publicly notify a regulator of the intention to use an approved methodology, which is deemed approved unless the regulator takes action within a short time period. The Colorado rule exemplifies this, as approval of an alternative AIMM can be used by anyone—not just the applicant– so long as the alternative AIMM approval requirements are met.

For **operators**, one regulatory element that encourages collaboration on new methodologies is the prospect of no longer being subject to the existing requirements. If an approved application describes how to phase out use of the status quo for LDAR, the applicant and approved followers should be able to ramp down one methodology after ramping up the alternative.

Interjurisdictional collaboration

The opportunity for regulations to encourage innovation is even stronger with interjurisdictional collaboration. It can take months, and possibly more than a year, for an operator and innovator to test and receive approval for a new methodology in one jurisdiction. The prospect of doing that more than once to receive approval in a subsequent jurisdiction could significantly stifle innovation. On the other hand, the potential of a multi-state market is a strong incentive to invest in the development of better methane management tools and strategies.

The path to streamline interjurisdictional collaboration begins with jurisdictions approving the same model to evaluate alternative methodologies and issuing guidance on assumptions they deem reasonable. An application in a subsequent jurisdiction can then specify how, if at all, the application differs from the first—for example due to different conditions or facilities. If the method, conditions, or facilities are not sufficiently different, new testing does not need to be carried out. The submission may be streamlined, and it may be deemed approved within a reasonable period of time.

As much as possible, all testing should be carried out for the first application. If further testing is required, however, for example because testing was not carried out in extremely low or high temperatures in the first state, then a subsequent state may request more testing. This new testing should be limited to the conditions or facilities that are outside the bounds of the assumptions approved in the first state. In this way, states can encourage innovation that achieves regulatory goals faster and less expensively.

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- **We ask that EPA allow an AMEL application for use of a new technology to be applied to *"a range of equipment and geographic boundaries"* (i.e. larger than a well site, such as a basin or other large area) [to be determined for each application] and that the emissions reductions across this area be aggregated to determine the performance of the technology** [show red-line language in 60.5398a (d)(1) of proposed rule].
    - [the rule language does not explicitly require site-specific HOWEVER the preamble of the proposed rule states that each equivalence determination must be made on a site by site basis using site specific data]
    - [to be clear, EPA is saying that multiple similar well sites can potentially be contained in a single AMEL application but that the equivalency analysis would have to be made on a site by site basis]
- **We believe that this is a valid method to determine equivalence in emission reductions of the new technology as compared to the current approved method (OGI/M21) as required per CAA 111(h)(3)**
    - ["Equivalency" is not defined in 111]
    - EPA explicitly stated in their 2008 OGI/M21 rulemaking that equivalence is determined based on 1) sensitivity of technology and 2) frequency upon which the technology is deployed. Need larger area to show that larger leakers are being detected and repaired faster for example
    - EDF stated in their *"Pathway for Alternative Compliance"* report (April 2019) this same concept that "emission reductions are determined in aggregate"... and that "a few sites will likely account for the bulk of emissions and it is impossible to predict where the super-emitters will occur" so "as a result a regulator must assess a method over a group of sites and a period of time".
- **We also believe that the term "source" in CAA 111(h)(3) does not limit each AMEL equivalency determination to a well site basis only as EPA contends**
    - The 111(h) standard is intended to replace a standard of performance applicable to an entire source category (oil and natural gas) per 111 (a) and so the logical inference is that section 111(h) standards also apply to entire source categories.
    - Used for "sources" or "categories of sources" to approve AMEL in Section 112
    - Alternatively, the term "source" in the rule is commonly used to reference the overall source type such "fugitive emission components" and does not limit the scope to a single component nor does it limit the scope to those fug. emissions components existing only at a single well site ["collection of fugitive emissions components at a well site" is called an "affected facility" not a "source"].
    - Nowhere in the rule is "source" used to describe equipment and/or specific equipment's emissions at a single well site. [Table 1 in preamble of Quad Oa final rule, pg. 35826

lists the various sources covered in the rule and "fugitive emissions from well sites and compressor station" as a whole is listed as a "source"]

- **To limit an AMEL equivalency determination to a well site only would greatly stifle innovation; need a larger area to show emission reductions of various different emerging technologies in order to get them approved**
    - EPA explicitly stated in their 2008 OGI/M21 rulemaking that equivalence is determined based on 1) sensitivity of technology and 2) frequency upon which the technology is deployed. Need larger area to show that larger leakers are being detected and repaired faster for example *[same sub point as in 2nd bullet above]*
    - EDF stated in their *"Pathway for Alternative Compliance"* report (April 2019) this same concept that "emission reductions are determined in aggregate"... and that "a few sites will likely account for the bulk of emissions and it is impossible to predict where the super-emitters will occur" so "as a result a regulator must assess a method over a group of sites and a period of time". *[same sub point as in 2nd bullet above]*
        - EDF is also aligned with industry and in favor of using modeling and controlled test environments to show performance and equivalency of new technology over an area

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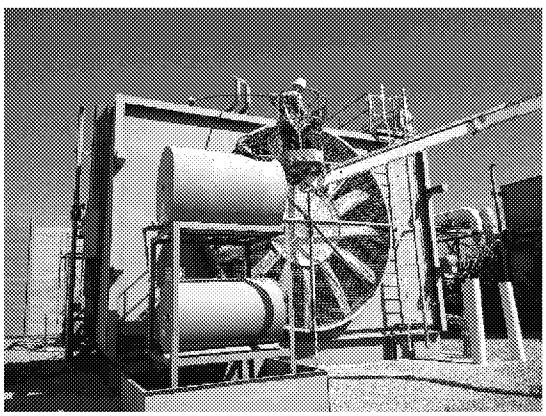
CANGET

Center for Advancing Natural Gas Emissions Technologies

Introduction

Natural gas is a clean-burning energy source that could positively impact climate change by reducing greenhouse gas emissions and undesirable air emissions. However, methane, the primary component of natural gas, is a potent greenhouse gas with a global warming potential 28/86 times[1] (100/20 year) higher than carbon dioxide. Net climate benefits of natural gas are highly dependent upon reducing methane emissions from the natural gas supply chain. In addition to methane, unprocessed natural gas also contains heavier hydrocarbons (VOCs) and toxic gases. Emission upstream of processing plants can impact local air quality and contribute to human health issues.



Compressor skid during a recent methane measurement field campaign by CSU.

Recent work has significantly advanced the understanding of the sources and magnitude of methane emissions from both leaks (fugitive emissions) and operational venting.[2–13] Investments by the US Department of Energy (DOE)[14] and others[15] have helped lower the cost of next-generation leak detection and quantification technologies, making continuous, automated monitoring cost-effective for the first time. However, there are significant questions about how these new technologies can be translated into action and accepted by regulatory authorities. **The Center for Advancing Natural Gas Emission Technologies (CANGET) at Colorado State University (CSU) will focus on this "path to deployment" for measurement technologies.** The new center will leverage our extended team's unique expertise as well as CSU's Methane Emissions Technology Evaluation Center (METEC). We envision four steps required to make widespread adoptions possible:

1) **Establishing baseline performance** for current leak detection technologies specified in regulations. Currently, a *quantitative* baseline does not exist for optical gas imaging (OGI) and, to a lesser extent, EPA Method 21. CSU has already begun this work in cooperation with the EPA.

2) **Developing a technology-independent method to compare leak detection technologies.** New technologies will exhibit significantly different operational modes, strengths and weaknesses relative to

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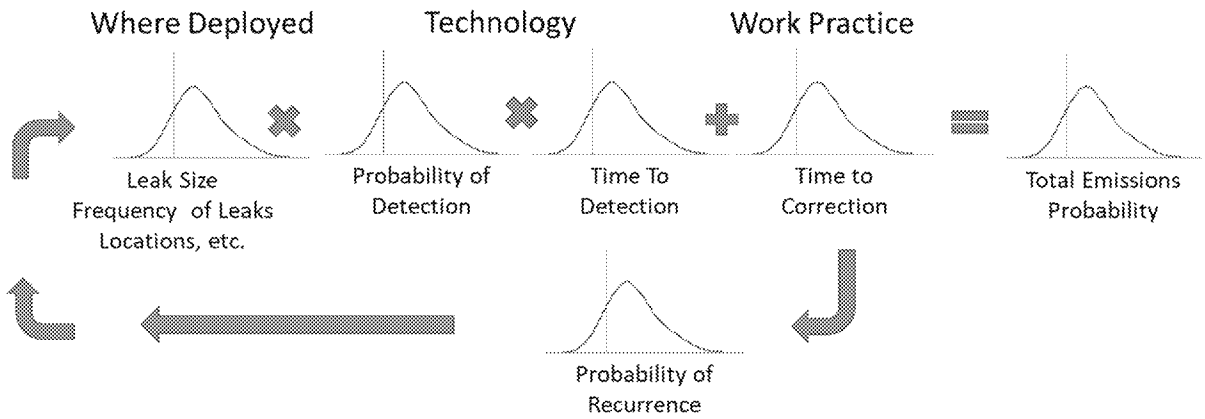

OGI and other accepted methods. To compare these technologies, CANGET envisions a statistical simulation tool (see figure), where experimentally determined key parameters (e.g. probability of detection by leak size & location) would be combined to estimate total emissions detected by a technology. These results, coupled with the corrective action protocols ("time to correction" in the figure) would estimate total emissions eliminated if the technology were implemented. This type of analysis allows different methods to be fairly compared. The model will start with the FEAST tool developed at Stanford University[16], but significant enhancements are required to complete the work.

3) **Developing test and acceptance protocols** to support method and technology comparisons by all interested parties. Protocols will consist of laboratory testing (e.g. METEC facility at CSU) and in-field testing of technologies. Results from this testing will populate the distributions indicated in step 2, and full transparency is paramount to support widespread adoption of the technologies and protocols.

4) **Preparing a diverse stakeholder base** for the regulatory and policy adoption cycle(s). Engaging industry, the regulatory community, and key environmental groups will be essential to successfully adopt advanced leak detection and quantification methods. CANGET will engage these groups, as outlined below, to build consensus on the solutions.

Results will provide immediate guidance to Member companies seeking to implement these technologies. Adjustments to the proposed path are expected, and will be developed jointly by center membership. Longer term, the center may extend work into emissions mitigation, based upon experience and the common interest of industry sponsors and center members.

Center Structure

The center will be headquartered at Colorado State University (Director: Daniel Zimmerle), with a study team from CSU, Harrisburg University of Science and Technology, Colorado School of Mines, and potentially other select research groups.

Detailed governance will be spelled out in a charter document to be signed by all Members. However, the envisioned structure is outlined here for discussion. **Center Membership will be restricted to operators active in natural gas operations, from exploration through distribution.** Each equal Member will have one seat in the executive steering committee (ESC) to define research priorities in conjunction with the

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center management team (CMT), consisting of the PIs from each core university partner. In general, university teams and/or external parties will form flexible study team(s) to perform research work on established priorities. Study teams may consist of staff from the primary university partners, external contractors, or other parties deemed ideally suited to a research task.

Governance decisions will be made by consensus of the ESC and CMT. Research priorities will be determined by voting as defined by the ESC and CMT (as commonly used in other industry associations).

Center Members may nominate technical contributors from their companies as technical advisors (technical review committee, or TRC) for each study effort. TRC groups will be kept as small and focused as possible to aid research momentum. In general, research results will be released as articles in peer-reviewed journals or engineering reports, as conditions warrant.

Non-operators (e.g. oil & gas associations, environmental groups, regulatory associations, and solution developers) will be permitted to join as Associate Members. Associate Members will be queried for their interests in research priorities, and will be provided results from research in special briefings at the time of publication. Associate Members will not be directly involved in research work and will have no access to results prior to publication.

Membership Benefits

Many operators are tracking improvements in leak detection & quantification technologies, but few have the resources to evaluate the 20+ technologies and associated solutions currently entering the market. The **Center will provide members (a) an advanced understanding of how technologies work in a variety of operational segments, (b) tools to compare technologies, and (c) guidance on how to integrate technologies into operational processes.**

Full benefit from these new technologies will be recognized only when they are accepted by regulatory authorities. The Center will provide key inputs needed to engage all stakeholders with unbiased scientific results to accelerate adoption of new, cost-effective, emissions mitigation technologies. In addition, much of the research will be performed by graduate students and post-doctoral staff at the universities, allowing sponsors to directly engage with well-trained potential employees.

Cost

Sponsoring Members will be required to contribute $50,000 per year toward research programs, and cover participation costs for their employees. The center will be instantiated if six or more operators agree to Membership. Dues for Members may be adjusted annually by mutual agreement after the first year.

All funds will be utilized for sponsored research projects, including labor, equipment, incidental expenses and reasonable organizational overheads. The center will not engage in lobbying or promotional activities, although ESC and CMT members may do so at their expense within the confidentiality constraints of the Center. The Center will also pursue administrative funding under the NSF Industry-University Cooperative Research Center program (I/U CRC program) or equivalent.

From time to time, CANGET may pursue external funding, such as Department of Energy sponsorship for field study campaigns. The ESC and CMT can elect to commit center funds as match funding for these efforts, or to identify incremental investments (e.g. in-kind support for projects) to catalyze these proposals.

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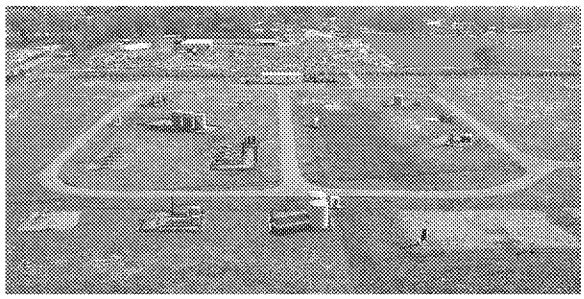
Roles

Center leadership will be housed at CSU, including the Director (Zimmerle) and administrative support.

CSU research staff will lead protocol development, testing and technology evaluation. CSU's METEC facility will be utilized for some of the testing. CSU will also work with sponsors to define best practices for implementing these technologies in the field.



Aerial view of the METEC test facility at Colorado State University in Fort Collins, Colorado.

Harrisburg University of Science and Technology (PI: John Quigley) will lead software development, including maintenance and enhancement of the simulation model in (2), above, and making that software model available via internet to all permitted users.

Colorado School of Mines (CSM) (PI: Kathleen Smits) will work closely with CSU to extend work to underground emissions from pipelines and natural sources. CSM is also a partner in the METEC facility.

Outreach to operators, environmental groups, and regulatory agencies will be shared across the CMT, and will benefit from a geographically diverse CMT membership.

Next Steps

CANGET is soliciting non-binding expressions of interest from operators to join the center. Assuming sufficient interest can be identified in Q1 2018, the center will be instantiated, and a governance agreement negotiated by the charter members.

A companion presentation can be delivered to interested parties via teleconference.

If you are interested in the center, please contact:

Daniel Zimmerle, dan.zimmerle@colostate.edu, +1 970 581 9945

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M21 → OGI equivalency rulemaking

62–296.417 Volume Reduction, Mercury Recovery and Mercury Reclamation (Effective 3/2/99)
62–296.418 Bulk Gasoline Plants (Effective 5/9/07)
62–296.470 Implementation of Federal Clean Air Interstate Rule (Effective 4/1/07)
62–296.480 Implementation of Federal Clean Air Mercury Rule (Effective 9/6/06)
62–296.500 Reasonably Available Control Technology (RACT)—Volatile Organic Compounds (VOC) and Nitrogen Oxides (NO_X) Emitting Facilities (Effective 1/1/96)
62–296.501 Can Coating (Effective 1/1/96)
62–296.502 Coil Coating (Effective 1/1/96)
62–296.503 Paper Coating (Effective 1/1/96)
62–296.504 Fabric and Vinyl Coating (Effective 1/1/96)
62–296.505 Metal Furniture Coating (Effective 1/1/96)
62–296.506 Surface Coating of Large Appliances (Effective 1/1/96)
62–296.507 Magnet Wire Coating (Effective 1/1/96)
62–296.508 Petroleum Liquid Storage (Effective 1/1/96)
62–296.510 Bulk Gasoline Terminals (Effective 1/1/96)
62–296.511 Solvent Metal Cleaning (Effective 10/7/96)
62–296.512 Cutback Asphalt (Effective 1/1/96)
62–296.513 Surface Coating of Miscellaneous Metal Parts and Products (Effective 1/1/96)
62–296.514 Surface Coating of Flat Wood Paneling (Effective 1/1/96)
62–296.515 Graphic Arts Systems (Effective 1/1/96)
62–296.516 Petroleum Liquid Storage Tanks with External Floating Roofs (Effective 1/1/96)
62–296.570 Reasonably Available Control Technology (RACT)—Requirements for Major VOC and NO_X-Emitting Facilities (Effective 3/2/99)
62–296.600 Reasonably Available Control Technology (RACT) Lead (Effective 3/13/96)
62–296.601 Lead Processing Operations in General (Effective 1/1/96)
62–296.602 Primary Lead-Acid Battery Manufacturing Operations (Effective 3/13/96)
62–296.603 Secondary Lead Smelting Operations (Effective 1/1/96)
62–296.604 Electric Arc Furnace Equipped Secondary Steel Manufacturing Operations. (Effective 1/1/96)
62–296.605 Lead Oxide Handling Operations (Effective 8/8/1994)
62–296.700 Reasonably Available Control Technology (RACT) Particulate Matter (Effective 1/1/96)
62–296.701 Portland Cement Plants (Effective 1/1/96)
62–296.702 Fossil Fuel Steam Generators (Effective 1/1/96)
62–296.703 Carbonaceous Fuel Burners (Effective 1/1/96)
62–296.704 Asphalt Concrete Plants (Effective 1/1/96)
62–296.705 Phosphate Processing Operations (Effective 1/1/96)
62–296.706 Glass Manufacturing Process (Effective 1/1/96)
62–296.707 Electric Arc Furnaces (Effective 1/1/96)
62–296.708 Sweat or Pot Furnaces (Effective 1/1/96)
62–296.709 Lime Kilns (Effective 1/1/96)
62–296.710 Smelt Dissolving Tanks (Effective 1/1/96)
62–296.711 Materials Handling, Sizing, Screening, Crushing and Grinding Operations (Effective 1/1/96)
62–296.712 Miscellaneous Manufacturing Process Operations (Effective 1/1/96)

M21/OGI

AWP

CHAPTER 62–297 STATIONARY SOURCE EMISSIONS MONITORING

62–297.100 Purpose and Scope (Effective 3/13/96)
62–297.310 General Compliance Test Requirements (Effective 3/2/99)
62–297.320 Standards for Persons Engaged in Visible Emissions Observations (Effective 2/12/04)
62–297.401 Compliance Test Methods (Effective 3/2/99)
62–297.440 Supplementary Test Procedures (Effective 10/22/02)
62–297.450 EPA VOC Capture Efficiency Test Procedures (Effective 3/2/99)
62–297.520 EPA Continuous Monitor Performance Specifications (Effective 3/2/99)
62–297.620 Exceptions and Approval of Alternate Procedures and Requirements (Effective 11/23/94)

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[FR Doc. E8–30126 Filed 12–19–08; 8:45 am]

BILLING CODE 6560–50–P

ENVIRONMENTAL PROTECTION AGENCY

40 CFR Parts 60, 63, and 65

[EPA–HQ–OAR–2003–0199; FRL–8754–5]

RIN 2060–AL98

Alternative Work Practice To Detect Leaks From Equipment

AGENCY: Environmental Protection Agency (EPA).

ACTION: Final rule.

SUMMARY: Numerous EPA air emissions standards require specific work practices for equipment leak detection and repair. On April 6, 2006, we proposed a voluntary alternative work practice for leak detection and repair using a newly developed technology, optical gas imaging. The alternative work practice is an alternative to the current leak detection and repair work practice, which is not being revised. The proposed alternative has been amended in this final rule to add a requirement to perform monitoring once per year using the current Method 21 leak detection instrument. This action revises the General Provisions to incorporate the final alternative work practice.

DATES: This final action is effective on December 22, 2008.

ADDRESSES: *Docket:* EPA has established a docket for this action under Docket ID No. EPA–HQ–OAR–2003–0199. All documents in the docket are listed on the *http://www.regulations.gov* Web site. Although listed in the index, some information is not publicly available, *e.g.*, Confidential Business Information or other information whose disclosure is restricted by statute. Certain other material, such as copyrighted material, is not placed on the Internet and will be publicly available only in hard copy form. Publicly available docket materials are available either electronically through *http://www.regulations.gov* or in hard copy at the Air and Radiation Docket Center (EPA/DC), EPA West Building, Room 3334, 1301 Constitution Ave., NW., Washington, DC. The Public Reading Room is located in the EPA Headquarters Library, Room Number 3334, and is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Public Reading Room is (202) 566–1744, and the telephone number for the EPA Docket Center is (202) 566–1742.

FOR FURTHER INFORMATION CONTACT: Mr. David Markwordt, Office of Air Quality Planning and Standards, Sector Policies and Programs Division, Coatings and Chemicals Group (E143–01), U.S. EPA, Research Triangle Park, North Carolina 27711, telephone (919) 541–0837, facsimile (919) 541–0246, e-mail *markwordt.david@epa.gov*.

SUPPLEMENTARY INFORMATION:

Regulated Entities. The regulated categories and entities affected by this final rule amendment include, but are not limited to the following North American Industry Classification System (NAICS) code categories:

Final Rule summary:
1) use 1) Leak definition and 2) monitoring frequency to show equivalency
2) goal → to detect leaking equipment from which a majority of

Category	NAICS Code	Examples of potentially regulated entities
Industry	325	Chemical manufacturers.
	324	Petroleum refineries and manufacturers of coal products.

This table is not intended to be exhaustive, but rather provides a guide for readers regarding entities likely to be affected by the national emission standards. To determine whether your facility is affected by the national emission standards, you should examine the applicability criteria in 40 CFR parts 60, 61, 63, and 65, including, but not limited to: Part 60, subparts A, Kb, VV, XX, DDD, GGG, KKK, QQQ, and WWW; part 61, subparts A, F, L, V, BB, and FF; part 63, subparts A, G, H, I, R, S, U, Y, CC, DD, EE, GG, HH, OO, PP, QQ, SS, TT, UU, VV, YY, GGG, HHH, III, JJJ, MMM, OOO, VVV, FFFF, and GGGGG; and part 65, subparts A, F, and G.

Worldwide Web (WWW). In addition to being available in the docket, an electronic copy of this final rule amendment is available on the WWW through the Technology Transfer Network (TTN). Following signature, a copy of this final rule amendment will be posted on the TTN's policy and guidance page for newly proposed or promulgated rules at the following address: *http://www.epa.gov/ttn/oarpg/*. The TTN provides information and technology exchange in various areas of air pollution control.

Outline. The information in this preamble is organized as follows:

I. Background Information
A. What is the statutory basis for this action?
B. What did we propose?
II. Summary of Changes to the Proposed Rule
A. Removal of the Minimum Detection Sensitivity Level Defaults
B. Annual EPA Method 21 Monitoring while Complying with the AWP
C. Re-screening Repaired Equipment
D. Recordkeeping for AWP Compliance
III. Response to Significant Comments
A. Basis of Standard
B. Applicability
C. Rule Location
D. Alternative Work Practice Procedures and Equipment Specifications
E. Recordkeeping and Reporting
F. Other Comments
IV. Statutory and Executive Order Reviews
A. Executive Order 12866: Regulatory Planning and Review
B. Paperwork Reduction Act
C. Regulatory Flexibility Act
D. Unfunded Mandates Reform Act
E. Executive Order 13132: Federalism
F. Executive Order 13175: Consultation and Coordination with Indian Tribal Governments
G. Executive Order 13045: Protection of Children from Environmental Health Risks and Safety Risks
H. Executive Order 13211: Actions Concerning Regulations that Significantly Affect Energy Supply, Distribution, or Use
I. National Technology Transfer and Advancement Act
J. Executive Order 12898: Federal Actions to Address Environmental Justice in Minority Populations and Low Income Populations
K. Congressional Review Act

I. Background Information

A. What Is the Statutory Basis for This Action?

Current leak detection and repair (LDAR) requirements are primarily applicable to sources through EPA work practice standards promulgated under Clean Air Act (CAA) section 111 (New Source Performance Standards (NSPS)) and section 112 (National Emission Standards for Hazardous Air Pollutants (NESHAP)). These sections authorize EPA to promulgate work practice standards in lieu of numerical emission standards when "it is not feasible in the judgment of the Administrator to prescribe or enforce an emission standard" because the regulated pollutants "cannot be emitted through a conveyance designed and constructed to emit or capture such pollutant * * * or [because] the application of measurement methodology to a particular class of sources is not practicable due to technological and economic limitations." 42 U.S.C. 7412(h)(1), (2); see also 42 U.S.C. 7411(h)(1), (2).

In promulgating such standards, we are not required to mandate a single work practice applicable to all sources in a source category but may instead provide several alternative work practice (AWP) options. Indeed, the United States Court of Appeals for the District of Columbia Circuit has indicated that EPA may provide sources with multiple work practice compliance options if EPA demonstrates that at least one of these options is cost effective and "expressly provides for the alternative in the standard." Arteva Specialties S.R.R.L., d/b/a *KoSa* v. *EPA*, 323 F.3d 1088, 1092 (DC Cir. 2003).

Once promulgated, EPA retains the authority to provide additional work practice alternatives. Such authority exists under EPA's general authority to review and amend its regulations as appropriate, *e.g.*, 42 U.S.C. 7411(b)(1)(B), 42 U.S.C. 7412(d)(6).

B. What Did We Propose?

The proposed AWP allows owners or operators to identify leaking equipment using an optical gas imaging instrument instead of a leak monitor prescribed in 40 CFR part 60, Appendix A–7 *i.e.*, a Method 21 instrument. The new work practice requirements are identical to the existing work practice requirements except for those requirements which are directly or indirectly associated with the instrument used to detect the leaks; for example, owners or operators are still subject to the existing "difficult to monitor," "unsafe to monitor," repair, recordkeeping, and reporting requirements. If a leak is identified using the optical gas imaging instrument, then the leak must be re-screened after repair using the imaging instrument.

Owners or operators are required to use an optical gas imaging instrument capable of imaging compounds in the streams that are regulated by the applicable rule. The imaging instrument must provide the operator with an image of the leak and the leak source.

Prior to using the optical gas imaging instrument, owners and operators are required to determine the mass flow rate that the imaging instrument will be required to image. The optical gas imaging instrument is required to either meet a minimum detection sensitivity mass flow rate (provided in the proposed AWP) or owners or operators can calculate the mass flow rate for their process by prorating a standard detection sensitivity emission rate (provided in the proposed AWP) using equations provided in the amendatory language. If the owner or operator chooses to prorate the standard detection sensitivity, they are required to conduct an engineering analysis to identify the stream containing the lowest mass fraction of chemicals that have to be identified as detectable.

Owners or operators are required to conduct a daily instrument check to confirm that the optical gas imaging instrument is able to detect leaks at the emission rate specified in the amendatory language (or calculated by the owner or operator). The instrument check consists of using the optical gas imaging instrument to view the mass flow rate required to be met exiting a gas cylinder.

Owners or operators using the AWP are required to keep records of the detection sensitivity level used for the optical gas imaging instrument; the analysis to determine the stream containing the lowest mass fraction of detectable chemicals; the basis of the mass fraction emission rate calculation; documentation of the daily instrument check (either with the video recording device, electronically, or written in a log book); and the video record of the leak survey.

II. Summary of Changes to the Proposed Rule

A. Removal of the Minimum Detection Sensitivity Level Defaults

The proposed rule contained equations that could be used by facilities to adjust the detection sensitivity level (*i.e.*, 60 g/hr) based on the composition of the compounds in the process lines. EPA also provided facilities the option of meeting a minimum detection sensitivity level in lieu of adjusting the detection sensitivity level.

In the final rule, we removed the minimum detection sensitivity level. This change was made after reviewing concerns expressed by commenters that the minimum detection sensitivity level would allow an emissions loophole for high purity systems. (See Section III.A for rationale.)

B. Annual EPA Method 21 Monitoring While Complying With the AWP

In the final rule, we are requiring owners or operators choosing to use the AWP to screen equipment using EPA Method 21 (*i.e.*, Method 21) instead of the optical gas imaging instrument in one screening period a year. Owners or operators conducting the Method 21 screening must meet the requirements in the applicable subpart and keep records of all screened equipment. (See Section III.A of this preamble for rationale.) Records of the annual Method 21 screening are to be submitted to the Administrator via e-mail to *CCG-AWP@EPA.GOV*.

C. Re-Screening Repaired Equipment

In the final rule, we are allowing owners or operators to re-screen equipment after being repaired using either the current work practice or the AWP if the leaks were detected using the AWP. Leaks detected by the current work practice must be re-screened using the current work practice. (See Section III.B of this preamble for rationale.)

D. Recordkeeping for AWP Compliance

In the final rule, we are requiring that owners or operators keep records of the equipment, process units, or facilities that are to be included in the AWP to document that a facility has chosen to comply with the AWP. This documentation must be kept for as long as the AWP is used and the Administrator may request to review it. We are also requiring that owners or operators keep video records of the daily instrument check and the leak survey results. The video records must be kept for at least 5 years. (See Section III.E of this preamble for rationale.)

III. Response to Significant Comments

The proposal provided a 60-day comment period ending, June 5, 2006. We received comments from 23 commenters. Commenters included State agencies, industry, industry trade groups, environmental groups and individuals. We have summarized the significant comments below. A complete summary of comments is provided in the response to comments document which can be found in Docket EPA–HQ–OAR–2003–0199.

A. Basis of Standard

Comment: One commenter suggested that the basis of EPA's assessment of optical gas imaging is from data for sources never regulated for leaking equipment and is significantly outdated compared to current LDAR implementation.

Response: As discussed in the proposal preamble (71 FR 17403), the most reasonable approach to determine if the AWP is equivalent to the original work practice (based on Method 21) is to model the emission reductions that would occur if you were to apply both programs on an uncontrolled facility. This allows for a direct comparison between the effectiveness of the two approaches. As explained in the proposal, the original uncontrolled baseline Method 21 data used to develop the existing work practice would have been appropriate to make the comparison. Unfortunately, this 25-year-old database is no longer available. The only uncontrolled data available is from natural gas processing plants, which are used in the modeled comparison. These plants were screened with Method 21 instruments in the early 1990s as part of an EPA/industry effort to develop emission factors for the refinery and gas processing industry.

Comment: Several commenters opposed immediate and complete phase-out of Method 21 because equivalency has not been proven and the optical gas imaging instruments have questionable ability to image materials emitted at the detection sensitivity level (*i.e.*, threshold leak rates). Several commenters explained that the studies referenced by EPA do not take into account the fact that a single leak's emission rate will vary over time and depend on process conditions (such as chemical activity, temperature, and pressure), and the type and size of the equipment. One commenter suggested that EPA has presented no evidence to support the presumption that leaking equipment below the sensitivity of the optical gas imaging instrument will proceed to leak at a higher rate over time and be discovered due to increased frequency of monitoring. One commenter stated that if smaller leaks will not be detected with the gas imaging instrument, then a site may end up with many undetected small fugitive equipment leaks and could result in higher emissions rates.

Another commenter asserts that optical gas imaging is not currently technically equivalent to Method 21 because the camera cannot detect small leaks of less than 60 grams/hour (g/hr). The commenter also stated that the side-by-side comparison of Method 21 and the optical gas imaging technology shows there are significant differences in the detection rate. The commenter questioned whether the increased frequency of monitoring to detect larger leaks will actually compensate for the camera's inability to detect small leaks. The commenter added that high risk leaks of carcinogens will continue to leak until they become large enough to be detected by the camera.

Response: When using any imaging instrument, leak detection requires two primary factors for its use: 1 The leak definition and 2 the monitoring frequency. Together, these factors form the foundation of an LDAR program for identifying fugitive emissions from leaking equipment. The current work practice uses various leak definitions based on parts per million (ppm) and corresponding monitoring frequencies (monthly, quarterly, or annually) for identifying leaking equipment. Emissions reductions occur when leaking equipment is identified and repaired. In developing the AWP, EPA sought to design a program for using the optical gas imaging instrument that would provide for emissions reductions of leaking equipment at least as equivalent as the current work practice. To do so, we used the Monte Carlo model for determining what leak rate definition and what monitoring frequency were necessary for the AWP. The following provides a brief explanation of how we used that model to obtain the 60 g/hr leak rate threshold and a bi-monthly monitoring frequency. For a more detailed explanation of the

Similar to FEAST Model

Equivalency = leak definition + C...

methodology used to develop the AWP, refer to the preamble for the proposed AWP (71 FR 17401).

Based on a 1993 petroleum industry study, EPA developed a statistical relationship between measured (bagged) mass emissions and the associated measured Method 21 screening values. This statistical relationship established the probability of registering a Method 21 screening value for a given range of mass emissions. The statistical relationship was then used to simulate detection of leaks by the Method 21 work practice in the computer model. The modeling program compares the screening value of Method 21 to various leak definitions to determine if a leak would be detected. Similarly, the model assigns a mass rate detection limit to the AWP. For each piece of equipment with a leak at or above the assigned mass detection limit, the program specifies detection by the AWP. Modeling results showed a work practice repeated bimonthly with a detection limit of 60 g/hr range was equivalent to the existing work practice. The model generated different detection limits for the 500 and 10,000 ppm thresholds in existing rules. The final rule reflects the mass detection limit for 500 ppm, *i.e.*, the most stringent limit in the Federal LDAR rules, thus, providing equivalency for both leak definitions.

The final AWP is not phasing out the existing Method 21-based LDAR work practice standards. Rather, the final rule allows owners/operators to choose to use the AWP in place of the current work practice wherever applicable. When used, the AWP provides equivalent control and appears to be less burdensome to implement. Additionally, industry has purchased many optical gas imagers and has had the opportunity to become proficient with their use. For these reasons, we expect the AWP to quickly come into widespread use. We see no reason why this is not a good outcome, especially given, as discussed below, that the final AWP includes an annual Method 21 monitoring requirement.

We disagree with the commenter's assertion that optical gas imaging cannot detect leaks at or less than 60 g/hr. The tests conducted using various optical imaging devices have shown that many gas imaging instruments detect emissions significantly below the 60 g/hr limit (Docket ID No. EPA–HQ–OAR–2003–0199–0027). Moreover, equivalence has been shown at a 60 g/hr leak rate, so it is not necessary that the optical gas imager detect leaks smaller than this level.

We also disagree that the side-by-side comparison of Method 21 and the AWP shows significant differences in mass of emissions detected. Available test data that we have reviewed shows that most of the mass emissions were detected by both Method 21 and the AWP (Docket ID No. EPA–HQ–OAR–2003–0199–0027, and the response to comments document which can be found in Docket EPA–HQ–OAR–2003–0199). The commenter did not provide data to support their assertion otherwise.

However, we recognize that modeling cannot address all of the uncertainties associated with equipment leaks because we lack sufficient information necessary to address all of the potential issues such as leak rates varying with time or with different operating scenarios. While commenters suggest these factors could affect the modeled equivalency determination, we are not aware of any specific data that shows this affect is real or that would allow us to include it in the equivalence modeling. As an example, one question not addressed by the modeling effort is the possibility that leak rates of the emitters below the imaging threshold of 60 g/hr will increase with time but stay below 60 g/hr and, therefore, not be imaged by the AWP. If the leak rate for the equipment currently leaking below the detectable threshold of the AWP gradually increases but stays below the detectable threshold, some situations may arise where cumulative emissions could exceed those emitted under the current program. We do not have evidence to support this scenario; however, we believe it prudent to protect against this scenario. Therefore, the final AWP requirements provide a transition to the new imaging technology. We have added an annual Method 21 screening to the AWP to address the concern of small leaks growing but not large enough to be detected with optical imaging. This requirement would take the place of one of the optical imaging screening surveys. The Method 21 screening must be conducted using the leak detection and repair requirements in the applicable subpart to which the equipment is subject and must be conducted for all equipment that are included in the AWP. Records of the annual Method 21 screening results must be kept. Records must identify the equipment screened, the screening value measured by Method 21, the time and date of the screening, and calibration information required in the existing applicable subparts. We recognize that including an annual Method 21 screening survey in the AWP will decrease the cost savings that may have occurred under the proposed requirement; however, we fully expect that the costs of the final AWP will be substantially less than those of the current work practice, so we hope that the added costs will not deter facilities from adopting the final AWP.

As industry adopts the AWP and reports to us their records of the results of the annual Method 21 monitoring, we will review this data to assess the extent to which small leaks go undetected and become larger while remaining undetected. We will consider these results, along with other relevant information, in any future revisions to the AWP.

Comment: One commenter requested EPA explain the relationship between the 60 g/hr threshold and the 500, 1,000, 2,000, and 10,000 ppm concentration cutoffs in the existing LDAR regulations. The commenter suggested that EPA set up different leak definitions to recognize that some equipment inherently leak less material than others and thus only need to be repaired after reaching the specified leak level. The commenter also indicated that the increased leak definition for auto-polymerizing compounds were included in most LDAR regulations to recognize that these materials are less likely to leak into the atmosphere. The commenter concluded that the 60 g/hr leak threshold does not recognize any of the specific situations that have caused EPA to promulgate these provisions.

Two commenters suggested that the equivalency analysis does not show that the gas imaging leak threshold of 60 g/hr is equivalent to a Method 21 measurement of 500 ppm, especially when connectors and other equipment are considered. Another commenter added that another study showed that an equivalent leak threshold for flanges is 24 g/hr instead of 60 g/hr. The commenter requested that EPA justify applying the same leak threshold to virtually all types of equipment. The commenter also stated that another study showed the equivalent leak threshold for valves was 36 g/hr, and suggested using this stricter standard.

Response: The explanation of the relationship between the 60 g/hr leak threshold and various leak definitions is provided in EPA's discussion of the Monte Carlo analysis (Docket ID No. EPA–HQ–OAR–2003–0199–0005). Additionally, as explained in the response above, the equivalency determination was based on comparing the current work practice leak definition and monitoring frequency requirements with various leak rates and monitoring frequencies generated by the Monte Carlo model. We modeled the most stringent leak definition (500 ppm) to

determine the leak threshold for the AWP under the assumption that if a source could meet the most stringent leak threshold, it could meet less stringent leak definitions in any of the Federal equipment leak standards.

The 60 g/hr leak threshold, when monitored bi-monthly, is the modeled equivalent for the vast majority of LDAR programs. Other equipment subject to LDAR rules is monitored at a higher leak definition (*i.e.*, 1,000 ppm, 2,000 ppm, 10,000 ppm) and monitored less frequently (*i.e.*, quarterly or annually). Thus, facilities using the AWP to monitor these other pieces of equipment should see results at least as stringent as using the current work practice. We lacked sufficient bagging data on other equipment to develop correlations using the model. However, the bagging data for those other pieces of equipment could be, and was, used to validate the results from the Monte Carlo analysis.

One commenter referred to an industry study showing that if a different dataset consisting of information from southern California refineries were used in the Monte Carlo analysis, the equivalent leak threshold for valves would be 36 g/hr and flanges would be 24 g/hr. There are several reasons why the California data is not appropriate for the analysis. First we would note that the dataset from the California refineries was from refineries where equipment leak standards were already in place and leak thresholds would be lower. Such a dataset from controlled facilities would not be appropriate for the equivalency analysis. As discussed in the proposal preamble and in previous responses, a technically defensible equivalency determination of any AWP requires modeling of an uncontrolled facility. Second, the equipment leak work practice requirements in the California rules, which the refineries would be subject to, are not identical to those in EPA regulations with Method 21. There were significant differences between Method 21 requirements and the requirements for equipment leaks in California such that screening results from the two are not equivalent. To make a comparison with EPA's Monte Carlo analysis, the California data was modified to approximate the requirements of Method 21. However, this modification is only an approximation and does not exactly replicate Method 21 results. Third, we also note that the leak threshold of 24 g/hr for flanges was calculated assuming quarterly monitoring. However, the EPA requirements for flanges only require monitoring about every 2 years. To conduct a proper model for flanges, the analysis would need to be run on a 2-year basis. As stated in the report (Docket ID No. EPA–HQ–OAR–2003–0199–0032), "the equivalent AWP (leak threshold) increases as the AWP monitoring frequency increases." This trend implies an equivalent leak threshold based on the existing 2-year monitoring requirement would be much higher than the 24 g/hr number and likely above 60 g/hr.

Regarding auto-polymerizing compounds, we lack sufficient information to equate mass leak rates to concentration levels for them. The commenter did not provide any additional information that would allow us to do so. Therefore, we are not providing leak thresholds specific to auto-polymerizing compounds. We acknowledge the AWP may result in more stringent control than the current work practice required in equipment leak standards for polymers and resins because the model analysis used to develop the AWP was conducted at a leak definition of 500 ppm, the most stringent leak definition in Federal rules, and using data from natural gas processing plants. If the owner or operator considers the AWP not to be appropriate for their facility they can continue to use the current work practice to identify leaking equipment.

Comment: One commenter suggested that using the optical gas imaging instrument may miss intermittent leaks, which may add significantly to fugitive emissions. The commenter added that the AWP needs to account for how at certain times potentially large leaks can be disguised as small leaks.

Response: Previous EPA studies have shown that most emissions are from equipment with the larger leaks. (Docket ID No. EPA–HQ–OAR–2003–0199–0044) Prior to leak detection and repair programs, 95 percent of the mass emissions were emitted from 5 percent of the equipment, *i.e.*, equipment leaking at greater than 10,000 ppm. Additionally, tests conducted to ascertain the performance of optical gas imaging cameras show that the cameras identified all leaks greater than 60 g/hr (Docket ID No. EPA–HQ–OAR–2003–0199–0027, and the response to comments document which can be found in Docket EPA–HQ–OAR–2003–0199). These results show that the AWP will achieve EPA's goals of detecting leaking equipment from which the majority of emissions arise. As a point of comparison, we would also note that the current work practice can erroneously register low ppm readings below the leak threshold for large emitters, *i.e.*, the current work practice can show a broad range of readings for the same mass emission. Therefore, the current work practice also would not identify all leaking equipment. Also, neither the current work practice nor the AWP will identify intermittent leaks because these leaks occur when equipment is not monitored.

The final rule also requires that any leak, no matter how small, viewed by the optical gas imaging instrument is considered a leak and must be repaired. The performance tests show that the camera can in practice "see" leaks as low as 10 g/hr, which is below the 60 g/hr leak threshold determined to be equivalent to the current work practice. As a result, the cameras will identify equipment leaking below the 60 g/hr leak threshold and those leaks are required to be repaired. Thus, a large leak that could be "disguised" as a smaller leak under the current work practice would not be misidentified and avoid repair.

Comment: One commenter suggested that a loophole in the AWP allows inspectors to bypass proper adjustments for high purity systems containing undetectable chemicals. The commenter explained that the optical gas imaging instrument can only detect volatile organic compounds (VOC) that absorb or emit infrared light. In the synthetic organic chemicals manufacturing industry, high purity systems are common, and leaks can go undetected if the dominant chemical does not register with optical gas imaging technology. The commenter added that the proposal contains a loophole that gives the inspector the option of using a minimum mass flow rate threshold of either 10 g/hr for pumps or 6 g/hr for all other equipment instead of adjusting the threshold to accommodate the instrument's detection limits. The commenter questioned EPA's assumption that all leaks encountered during an inspection contain at least 10 percent detectable chemicals. The commenter recommended that EPA remove this loophole by eliminating section 60.18(i)(2)(i)(B) from the rules. The commenter also recommended that Method 21 be used for high purity situations where chemicals have not been verified as adequately detectable using the optical gas imaging technology. The commenter concluded that if EPA chooses to keep the loophole, it should address whether the technology fails to detect a high number of leaks that are smaller than 6 g/hr.

Response: After further review of the commenter's concerns, we have determined that the commenter is correct regarding the minimum detection sensitivity level provided in the tables. The potential exists for high

purity systems to have leaks not identified if the minimum detection sensitivity level is used instead of being calculated. Consequently, the final rule requires that the detection sensitivity level be calculated using the equation in section 60.18(i)(2)(i). The minimum detection sensitivity level concept has been removed from the final rule. We also note that the optical gas imaging instrument is allowed to be used only where it will respond to the equipment leaking. Therefore, if the instrument does not respond to high purity streams, it cannot be used to detect leaks. The current work practice using Method 21 must be used instead.

B. Applicability

Comment: One commenter requested that EPA clarify that a facility is not required to monitor equipment using Method 21 and the AWP.

Response: The standard is an alternative to the existing work practice and may be used in place of the existing work practice where feasible and whenever the owner or operator chooses to do so. We are not requiring that both be used at the same time. We are requiring that each facility choosing to use the AWP monitor the same regulated equipment with a 40 CFR part 60, Appendix A–7, Method 21 monitor once per year.

approval could have conditions to use new tech.

Comment: Several commenters suggested that leaks identified using the gas imaging instrument should be verified using traditional Method 21. Another commenter opposed allowing Method 21 to be used to check for leaks found with optical imaging. The commenter suggested that the methods could give contradictory results and would serve no purpose. The commenter added that because EPA states in the proposal that the AWP provides equivalent or better emissions control than Method 21, there is no justification for requiring both methods to be applied to the same equipment.

Two commenters also requested that EPA consider allowing facilities the option to use Method 21 or the Gas imaging AWP for post repair monitoring requirements. The commenters opposed the required approach of being limited to the same method for repair monitoring.

Response: We do not believe that leaks identified in the initial screening using the AWP need to be screened using the current work practice to verify the leak. By definition in the AWP, a leak is any emissions imaged by the optical gas imaging instrument. Requiring the facility to use a Method 21 monitor to verify what the optical gas imaging instrument has already detected would be an unnecessary duplication of effort and resources.

On the other hand, we have decided that it would be appropriate to allow either the current work practice or the AWP to be used for repair purposes when the AWP is used for the initial screening. Test information has demonstrated that a Method 21 instrument will detect leaks that the gas imaging instrument will detect (Docket ID No. EPA–HQ–OAR–2003–0199–0027, and the response to comments document which can be found in Docket EPA–HQ–OAR–2003–0199). Therefore, it is appropriate to allow its use when optical gas imaging instruments are used to find leaks. If a Method 21 instrument is used for repair monitoring, the leak definition in the applicable subpart to which the equipment is subject must be used to determine if the repair is successful. However, the AWP instrument will not be allowed to verify the repair has been made after the Method 21 instrument is used for the once-a-year monitoring.

Comment: Several commenters suggested that an owner or operator should be able to selectively apply the proposed AWP to a part of the facility, part of a process unit, or even individual equipment. The commenters added that selective application of the AWP is appropriate because optical gas imaging technology is new and few facilities have experience with it, differences within a facility suggest the use of Method 21, or the AWP to various parts of the plant, and it would encourage the development of the technology.

Response: We agree with the commenters' suggestion. The AWP may be used for the entire facility, a process unit, or a group of equipment. The decision is up to the owner or operator how broadly the AWP will be used. The owner or operator is required to keep records of where the AWP will be used as part of the documentation of the detection sensitivity level value.

Comment: Two commenters suggested that EPA should allow flexible use of the AWP by allowing facilities to move from traditional monitoring to optical imaging and vice versa without being subject to a permitting approval process. The commenters added that a facility cannot switch from one technology to another without assuring that monitoring frequencies and protocols are fully addressed upon switching.

Response: The flexibility that the commenters are requesting is beyond the scope of this action. The issues need to be raised in the context of the title V program and the specifics of individual facility permits.

Comment: Several commenters supported using the AWP for monitoring closed vent systems. Another commenter suggested that most pressure relief vents (PRV) are installed in closed vents routed to control devices. Therefore, optical sensing methods cannot evaluate emissions inside a closed vent conveyance. The commenter concluded that the AWP must allow mixed monitoring methods for closed vents. One commenter asserted that the AWP has to be applicable for a 500 ppm leak and any change to the standard for monitoring closed vent systems would be outside the scope of the AWP. One commenter recommended that the owner or operator be given the option of using either Method 21 or an optical imaging camera to monitor PRV after the pressure releases.

One commenter supported the lower leak rates for closed vent systems (*e.g.*, 3 g/hr) but noted that the leak rate would be for mass flow for a bi-monthly inspection schedule. The commenter added that closed vent systems are typically inspected on an annual basis and the equivalent leak rate, using the Monte Carlo analysis, for annual inspection would be 0.013 g/hr, which is below the range that the technology can reliably find leaks. The commenter added that to allow use of the optical gas imaging technology to monitor closed vent systems, EPA must create a revised inspection schedule which balances frequency with limitations of the optical technology. The commenter also added that if the optical imaging technology cannot reliably measure emissions at low leak rates, Method 21 should be used. The commenter stated that supplementing the optical gas imaging technology with Method 21 would catch more small leaks characteristic of closed vent systems.

Response: In the preamble to the proposed rule, we took comment on whether the AWP was appropriate for closed vent systems but did not include language to permit such use. We have evaluated the commenters' concerns and have decided that the AWP is not appropriate for monitoring closed vent systems, leakless equipment, or equipment designated as non-leaking. While the AWP will identify leaks with larger mass emission rates, tests conducted with both the AWP and the current work practice indicate the AWP, at this time, does not identify very small leaks and may not be able to identify if non-leaking/leakless equipment are truly nonleaking because the detection sensitivity of the optical gas imaging instrument is not sufficient. Therefore, in the final rule, as in the proposed rule,

we have decided not to allow the AWP to be used for closed vent systems, leakless equipment, or equipment designated as non-leaking.

Comment: Several commenters supported using the optical imaging technology to find, review, and fix non-regulated and previously non-detectable leaks without additional regulatory burden and fear of reprisal from enforcement actions. One commenter suggested that the camera be used as a form of enhanced visual inspection to quickly identify whether a group of equipment has passed or failed and that result be stored in a database. Then, the camera and recorded video could be used to target only the leaking equipment. Another commenter supported using the optical imaging device as a screening tool for leaks so that annual Method 21 leak checks could be targeted to equipment suspected of leaking.

Other commenters asserted that the AWP should require that all leaks detected with optical gas imaging be corrected according to the existing leak correction time requirements, regardless of whether or not the equipment would have been required to be monitored using Method 21. One commenter added that if the operator monitors leaks outside of the EPA requirement, the AWP should require the company maintain records. The commenter stated this would prevent operators from repairing leaks just prior to an official inspection and reporting artificially low levels. One commenter requested that the AWP also apply to inaccessible and unsafe to monitor equipment. The commenter also suggested that expanding the inventory would reduce the number of large leakers, and reduce the cost to the plant by enabling the plant to repair large leakers rather than an inventory of equipment which they are mandated to monitor and repair.

Response: The AWP requirements are intended to provide an alternative to the current work practices using Method 21. Requirements in the existing subpart that are specific to Method 21 do not apply to the AWP. All other requirements in the applicable subpart that are not specifically addressed in the AWP apply, such as schedule for repairs, designation of difficult to monitor equipment and unsafe to monitor equipment. Therefore, the schedule for repairing leaks is the same for both work practices. The final rule changes were not intended to expand the applicability of the existing rules. The Agency has promulgated the AWP to facilitate the use of emerging technology as quickly as appropriate. Once the regulated community and EPA have more experience with the AWP, we may consider expanding the applicability of the existing rules.

Comment: Several commenters provided input on definitions for "difficult to access" or "unsafe to access" or "unsafe to repair" or "difficult to repair." Several commenters requested EPA include the concept of "difficult to access" in the AWP because access is still required to make repairs and in some cases this may not be possible. One commenter suggested replacing the term "difficult to access" with "unsafe to access." One commenter also suggested adding a definition for "unsafe to access" equipment because the AWP would allow more frequent monitoring of these equipment due to the nature of the technology, but does not address the repair requirements for such equipment. One commenter suggested for equipment designated as "difficult to access" repair be required as soon as practical but no later than 90 days. Equipment identified as "unsafe to access" should be required to be repaired when it is safe to do so. One commenter requested EPA to describe how facilities switching to the AWP would manage their "difficult to monitor" lists.

Response: The interpretations of the terms "difficult to monitor," "difficult to repair," or "unsafe to monitor" are driven by work practice in use and therefore are not addressed in this section. We expect the population of equipment so designated under the existing work practice will change to accommodate the differing capabilities of the AWP instrument. Therefore, we are not addressing "difficult to monitor," "difficult to repair" or "unsafe to monitor."

C. Rule Location

Comment: Several commenters supported locating the AWP in the General Provisions. However, many of the commenters requested that the AWP be located in the General Provisions to each applicable Part rather than only in Part 60. Other commenters preferred that Method 21 be revised to include the AWP rather than include language in the General Provisions.

Several commenters supported including the amendatory language in each applicable subpart and opposed having it in only one Part. The commenters suggested that the proposed method would result in numerous inconsistencies with the subparts and would be confusing.

Two commenters suggested that the proposed language in the 40 CFR part 60 General Provisions was legally insufficient. One of the commenters asserted that EPA must incorporate the AWP into all subparts where it will be readily apparent to the affected industry groups, regulators, and the public.

Response: We believe there is no simple way to incorporate the AWP into the numerous subparts. The General Provisions appear to be the most efficient way to accommodate the desired amendments, so in response to the comments received, we have decided to incorporate the AWP into the General Provisions of parts 60, 63, and 65. The AWP is also applicable to those subparts in part 61 that reference the General Provisions in part 60. Additionally, where specific subparts require modification (such as tables in Part 63 subparts that reference General Provisions sections), we have made the appropriate revisions. The suggestion to incorporate the AWP into Method 21 is both inappropriate and awkward because Method 21 contains a test method only and should not contain recordkeeping, reporting, and monitoring requirements.

D. Alternative Work Practice Procedures and Equipment Specifications

Comment: One commenter requested that use of the optical imaging technology be complemented with Method 21 as necessary to compensate for shortcomings in the camera design. The commenter noted the differences between active and passive cameras and their vulnerabilities, as well as interferences from carbon dioxide and steam/water, use outdoors, and the color of the background. The commenter recommended that the AWP should fully address the limitations of each technology and require that inspectors identify and make records of equipment types that are poor candidates for either kind of optical gas imaging technology.

Response: The AWP can only be used to detect leaks when the gas imaging instrument is shown to work (i.e., streams that contain compounds that can be detected by the gas imaging instrument). Therefore, if a specific type of gas imaging device does not work on a stream, operators will continue to use the Method 21-based work practice for these equipment. Although this commenter did not provide any data supporting the need to augment the AWP with the Method 21 instrument, as explained earlier, we are requiring annual monitoring with the Method 21 instrument. (See section III.A of this preamble for a discussion of this requirement.)

Comment: One commenter requested EPA to explain how a facility would identify which analytical methods

should be used for which compounds, especially when potentially incompatible compounds may be included in a mixture within a group of emission equipment. The commenter added that it would be unfair to penalize a facility by prohibiting the use of the AWP because the AWP cannot detect all VOC in a specific process unit.

Another commenter requested clarification that the requirement in 40 CFR 60.18(i)(1) that imaging the compounds in the streams does not mean or imply that every compound in the stream must be detected.

Response: The AWP does not require that every compound in the stream be detected. Only one compound needs to be able to be viewed. However, the 60 g/hr leak rate threshold must be adjusted, *i.e.*, scaled down, to account for compounds that are not seen. The language in the final rule was modified to clarify this point.

Comment: One commenter requested that petroleum refineries be exempt from the stream speciation and variability of process stream requirements because petroleum refineries were used in the development of the standard and because the mixed hydrocarbons contained in the streams have been demonstrated to meet all the monitoring criteria. The commenter specifically opposed requiring an engineering analysis. The commenter suggested adding language that allows the determination to be based on the process knowledge that an image from the camera is not a leak if that image is determined to be steam or other unregulated material.

Response: In the proposed rule, we provided a definition for "engineering analysis" that described the requirements for determining the piece of equipment in contact with the lowest mass fraction of chemicals that are detectable. In the final rule, we have decided to put the requirements for the analysis directly in the rule rather than have a separate definition.

In the final rule, we are requiring owners or operators to determine the piece of equipment in contact with the lowest mass fraction of chemicals that are detectable. It is up to the owner or operator to provide sufficient information to meet this requirement. This information may include process knowledge, previous studies, or analyses conducted for the AWP. The documentation of the analysis is required to be kept as a record for as long as the AWP is used and must be updated to incorporate any changes that may affect the analysis. The Administrator may request to review the documentation. Because this requirement is now in the rule, it is not necessary to include it in the term "engineering analysis." Therefore, in the final rule, the term "engineering analysis" has been removed.

We also disagree that petroleum refineries should be exempted from the stream speciation and variability of process stream requirements. The commenter's reasoning is not a sufficient justification for such an exemption because, although some refinery streams were used to develop the method, there are a wide variety of refineries with varying streams and without site specific analysis we have no assurance that the required leak rate can be imaged.

E. Recordkeeping and Reporting

Comment: One commenter requested the owner or operator of an affected source be required to submit notice to the Administrator that they have elected to use the AWP and state the duration the AWP will be used.

Response: For the final rule, we have required a memorandum to the owner's or operator's file identifying the equipment, process units, or facilities that are to be included in the AWP to document that a facility has chosen to comply with the AWP. This documentation must be kept for as long as the AWP is used and the Administrator may request to review it. It is not necessary to submit notification to the Administrator that the AWP will be used. Owners or operators are still required to meet the requirements in the subpart except where they are superseded by the AWP. Therefore, the same reports and records kept for the current work practice will be required for the AWP.

Comment: Several commenters requested that EPA allow owners/operators the option of keeping video records to provide flexibility; others opposed requiring keeping video records. Several commenters added that recordkeeping for the AWP should not be more burdensome than the applicable subparts. The commenters noted that the AWP will add significant burden to facilities and regulators. One commenter stated that facilities will incur burden from additional storage of electronic files. The commenter provided estimates of the amount of electronic storage space that would be necessary, indicating as much as 50 gigabytes would need to be stored per inspection. The commenter added that EPA should consider the time needed to transfer large files between field data collection devices and the plant's computer in the time necessary to use the AWP. One commenter expressed concern about maintaining videos of every leak survey, especially if the AWP requires that each piece of equipment be imaged separately. The commenter noted that the battery life of the camera and recorder are limited, storage of the videos will be burdensome, and data retrieval will require searching the videos and will be cumbersome.

Other commenters suggested that video records of the daily instrument check should be required. One commenter recommended EPA maintain the documentation requirements for monitoring of all equipment. The commenter asserted that video documentation is an important enforcement tool and is a safeguard against fraud. The commenter disputed industry assertions of the cost of keeping video records and suggested that computer storage represents only a fraction of the costs of the LDAR program.

Response: The final rule requires that if the owner or operator chooses to use the AWP, video records of all viewed regulated equipment and video records of the daily instrument check must be kept for 5 years. We recognize that data files for video records may be large. However, to ensure that the AWP is being complied with, we believe it is necessary to require video records of each piece of equipment that is viewed. We would also like to reiterate that the standard is an AWP. If owners or operators believe that the video recordkeeping requirements are too burdensome, they may continue to comply with the existing requirements as written. We also note that the AWP is not superceding the recordkeeping and reporting requirements that are in the existing equipment leak standards. The owner or operator must still keep those records. However, in the final rule a video record can be used to meet the recordkeeping requirements of the applicable subparts if each piece of regulated equipment selected for this work practice can be identified in the video record.

F. Other Comments

Comment: One commenter asked EPA to clarify whether a requirement that the instrument be intrinsically safe will be incorporated into the AWP. One commenter suggested that a significant burden will be incurred by requiring instruments that are intrinsically safe. The commenter added that EPA is requiring that personnel take into hazardous areas data storage devices that are not intended for that purpose.

Response: We are not requiring that gas imaging instruments be intrinsically safe. It is incumbent upon the

manufacturer to develop instruments that are designed to meet the requirements of the chemical facility or refinery. Facilities may or may not require equipment be intrinsically safe. The owner or operator is not being required to use the AWP. If such instruments are not available, and the operator requires intrinsically safe instruments, then the owner or operator does not have to choose to use the AWP.

Comment: Several commenters requested that EPA provide guidance on how a facility would calculate emission rates for emission inventories if the AWP is in use. One commenter specifically asked how a facility would manage default zero equipment for emission estimation purposes. Several commenters added that if guidance is not provided, EPA should revise the AWP to include quantification procedures consistent with EPA's preferred methodology. One commenter asserted that optical gas imaging is limited by its inability to quantify leak concentration, which are converted to emission rates using the correlation equations. The commenter added that facilities must be required to use Method 21 or an equivalent emissions estimation technique to quantify leaks detected with optical gas imaging. Another commenter suggested that gas imaging technology has the ability to quantify emissions; therefore, quantification should be required in the AWP.

Response: The Agency recognizes the need for new approaches to estimate emissions from facilities that implement the AWP. We will work with stakeholders to develop the necessary tools for quantification. In the final rule, we are also requiring each facility complying with the AWP also monitor the same regulated equipment with a Method 21 monitor once per year. The data gathered from this requirement will help us address the issue of emissions quantification.

Comment: One commenter considered that public notification of the rulemaking was incomplete and inadequate because the title and summary of the proposed rule only addressed 40 CFR part 60 but the proposal would amend 40 CFR parts 61, 63, and 65 as well. The commenter added that before EPA promulgates the AWP, it needs to propose the AWP for parts 61, 63, and 65.

Response: We believe that sufficient notification was provided that the AWP would apply to subparts other than in 40 CFR part 60. The proposed rule specifies in 40 CFR 60.18(a)(2) that the AWP is available to all subparts in 40 CFR parts 60, 61, 63, and 65 that require monitoring of equipment with a 40 CFR part 60, Appendix A–7, Method 21 monitor. The rule clearly states that the AWP applies to 40 CFR parts 60, 61, 63, and 65. Similarly, the preamble to the proposed rule states that it applies to 40 CFR parts 60, 61, 63, and 65.

IV. Statutory and Executive Order Reviews

A. Executive Order 12866: Regulatory Planning and Review

This action is not a "significant regulatory action" under the terms of Executive Order 12866 (58 FR 51735, October 4, 1993) and is, therefore, not subject to review under the Executive Order.

B. Paperwork Reduction Act

The information collection requirements in this rule have been submitted for approval to the Office of Management and Budget (OMB) under the *Paperwork Reduction Act*, 44 U.S.C. 3501, *et seq.* The information collection requirements are not enforceable until OMB approves them.

This final rule provides plant operators with an alternative method for identifying equipment leaks, but does not change the basic recordkeeping and reporting requirements in the various subparts of 40 CFR parts 60, 61, 63, and 65. However, EPA anticipates that this final rule will change the burden estimates developed and approved for the existing national emission standards by reducing the labor hours necessary to identify equipment leaks.

An ICR document (EPA ICR No. 2210.02) was prepared for this final rule to estimate the costs associated with reading and understanding the alternatives, purchasing an optical imaging instrument, and initial training of plant personnel. The ICR has been approved by OMB under the Paperwork Reduction Act, 44 U.S.C. 3501, *et seq.* The annual public burden for this collection of information (averaged over the first 3 years after the effective date of the final rule) is estimated to total 3,027 labor hours per year and a total annual cost of $2,260,189. EPA has established a public docket for this action (Docket EPA–HQ–OAR–2003–0199) which can be found at *http://www.regulations.gov*. The ICR for this final rule is included in the public docket. Burden is defined at 5 CFR 1320.3(b).

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control numbers for EPA's regulations in 40 CFR are listed in 40 CFR part 9. In addition, EPA is amending 40 CFR part 9 in the **Federal Register** to display the OMB control number for the approved information collection requirements contained in this final rule.

C. Regulatory Flexibility Act

The Regulatory Flexibility Act (RFA) generally requires an agency to prepare a regulatory flexibility analysis of any rule subject to notice and comment rulemaking requirements under the Administrative Procedure Act or any other statute unless the agency certifies that the rule will not have a significant economic impact on a substantial number of small entities. Small entities include small businesses, small organizations, and small governmental jurisdictions.

For purposes of assessing the impacts of the final rule on small entities, small entity is defined as follows: (1) A small business whose parent company has fewer than 100 to 1,500 employees, or a maximum of $5 million to $18.5 million in revenues, depending on the size definition for the affected North American Industry Classification System (NAICS) code; (2) a small governmental jurisdiction that is a government of a city, county, town, school district or special district with a population of less than 50,000; and (3) a small organization that is any not-for-profit enterprise which is independently owned and operated and is not dominant in its field. It should be noted that the small business definition applied to each industry by NAICS code is that listed in the Small Business Administration size standards (13 CFR part 121).

After considering the economic impact of this final rule on small entities, I certify that this action will not have a significant economic impact on a substantial number of small entities. In determining whether a rule has a significant economic impact on a substantial number of small entities, the impact of concern is any significant adverse economic impact on small entities, since the primary purpose of the regulatory flexibility analysis is to identify and address regulatory alternatives "which minimize any significant economic impact of the rule on small entities." 5 U.S.C. 603 and 604. Thus, an agency may certify that a rule will not have a significant economic impact on a substantial number of small entities if the rule relieves regulatory burden, or otherwise has a positive economic effect on all of the small entities subject to the rule.

We have concluded that this final rule imposes no additional burden on

facilities impacted by existing EPA regulations. This final rule allows plant operators to voluntarily use an AWP. In fact, EPA expects the AWP will relieve regulatory burden for all affected entities by reducing the labor hours necessary to identify equipment leaks.

D. Unfunded Mandates Reform Act

Title II of the Unfunded Mandates Reform Act (UMRA) of 1995, Public Law 104–4, establishes requirements for Federal Agencies to assess the effects of their regulatory actions on State, local, and Tribal governments and the private sector. Under section 202 of the UMRA, EPA generally must prepare a written statement, including a cost-benefit analysis, for proposed and final rules with "Federal mandates" that may result in expenditures by State, local, and tribal governments, in the aggregate, or by the private sector, of $100 million or more in any one year. Before promulgating an EPA rule for which a written statement is needed, section 205 of the UMRA generally requires EPA to identify and consider a reasonable number of regulatory alternatives and adopt the least costly, most cost-effective, or least burdensome alternative that achieves the objectives of the rule. The provisions of section 205 do not apply when they are inconsistent with applicable law. Moreover, section 205 allows EPA to adopt an alternative other than the least costly, most cost-effective, or least burdensome alternative if EPA publishes with the final rule an explanation why that alternative was not adopted.

Before EPA establishes any regulatory requirements that may significantly or uniquely affect small governments, including Tribal governments, EPA must have developed, under section 203 of the UMRA, a small government agency plan. The plan must provide for notifying potentially affected small governments, enabling officials of affected small governments to have meaningful and timely input in the development of EPA's regulatory proposals with significant Federal intergovernmental mandates, and informing, educating, and advising small governments on compliance with the regulatory requirements.

This final rule contains no Federal mandates (under the regulatory provisions of Title II of the UMRA) for State, local, or tribal governments or the private sector. This final rule imposes no enforceable duty on any State, local or tribal governments or the private sector. Thus, this final rule is not subject to the requirements of sections 202 and 205 of the UMRA.

E. Executive Order 13132: Federalism

Executive Order 13132 (64 FR 43255, August 10, 1999), requires EPA to develop an accountable process to ensure "meaningful and timely input by State and local officials in the development of regulatory policies that have Federalism implications." "Policies that have Federalism implications" is defined in the Executive Order to include regulations that have "substantial direct effects on States, on the relationship between the national government and the States, or on the distribution of power and responsibilities among various levels of government."

This final rule does not have federalism implications. It will not have substantial direct effects on the States, on the relationship between the national government and the States, or on the distribution of power and responsibilities among the various levels of government, as specified in Executive Order 13132. This final rule will not impose direct compliance costs on State or local governments, and will not preempt State law. Thus, Executive Order 13132 does not apply to this rule.

F. Executive Order 13175: Consultation and Coordination With Indian Tribal Governments

Executive Order 13175, entitled "Consultation and Coordination with Indian Tribal Governments" (65 FR 67249, November 9, 2000), requires EPA to develop an accountable process to ensure "meaningful and timely input by tribal officials in the development of regulatory policies that have tribal implications." This final rule does not have tribal implications, as specified in Executive Order 13175. It will not have substantial direct effects on Tribal governments, on the relationship between the Federal Government and Indian tribes, or on the distribution of power and responsibilities between the Federal Government and Indian tribes, as specified in Executive Order 13175. Thus, Executive Order 13175 does not apply to this rule.

G. Executive Order 13045: Protection of Children From Environmental Health Risks and Safety Risks

EPA interprets EO 13045 (62 FR 19885, April 23, 1997) as applying to those regulatory actions that concern health or safety risks, such that the analysis required under section 5–501 of the Order has the potential to influence the regulation. This action is not subject to EO 13045 because it is based solely on technology performance.

H. Executive Order 13211: Actions Concerning Regulations That Significantly Affect Energy Supply, Distribution, or Use

This rule is not a "significant energy action" as defined in Executive Order 13211, "Actions Concerning Regulations That Significantly Affect Energy Supply, Distribution, or Use" (66 FR 28355, May 22, 2001) because it is not likely to have a significant adverse effect on the supply, distribution, or use of energy. Further, we have concluded that this rule is not likely to have any adverse energy effects.

I. National Technology Transfer and Advancement Act

Section 12(d) of the National Technology Transfer and Advancement Act (NTTAA) of 1995 (Pub. L. 104–113; 15 U.S.C. 272 note) directs EPA to use voluntary consensus standards (VCS) in its regulatory activities unless to do so would be inconsistent with applicable law or otherwise impractical. VCS are technical standards (*e.g.*, materials specifications, test methods, sampling procedures, business practices) that are developed or adopted by one or more voluntary consensus bodies. The NTTAA directs EPA to provide Congress, through OMB, with explanations when EPA does not use available and applicable VCS.

This final rule does not involve technical standards. Therefore, the requirements of the NTTAA are not applicable.

J. Executive Order 12898: Federal Actions To Address Environmental Justice in Minority Populations and Low-Income Populations

Executive Order 12898 (59 FR 7629, February 16, 1994) establishes Federal executive policy on environmental justice. Its main provision directs Federal agencies, to the greatest extent practicable and permitted by law, to make environmental justice part of their mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of their programs, policies, and activities on minority populations and low-income populations in the United States.

EPA has determined that this final action will not have disproportionately high and adverse health or environmental effects on minority or low-income populations because it increases the level of environmental protection for all affected populations without having any disproportionately high and adverse human health or environmental effects on any

population, including any minority or low-income population. This final action would not relax the control measure on sources regulated by the rule and, therefore, would not cause emissions increases from these sources.

K. Congressional Review Act.

The Congressional Review Act, 5 U.S.C. 801, *et seq.*, as added by the Small Business Regulatory Enforcement Fairness Act of 1996, generally provides that before a rule may take effect, the agency promulgating the rule must submit a rule report, which includes a copy of the rule, to each House of the Congress and to the Comptroller General of the United States. EPA will submit a report containing this final rule and other required information to the United States Senate, the United States House of Representatives, and the Comptroller General of the United States prior to publication of the rule in the **Federal Register**. A Major rule cannot take effect until 60 days after it is published in the **Federal Register**. This action is not a "major rule" as defined by 5 U.S.C. 804(2). This final rule will be effective December 22, 2008.

List of Subjects

40 CFR Part 60

Administrative practice and procedure, Air pollution control, Reporting and recordkeeping requirements.

40 CFR Part 63

Administrative practice and procedure, Air pollution control, reporting and recordkeeping.

40 CFR Part 65

Administrative practice and procedure, Air pollution control.

Dated: December 15, 2008.

Stephen L. Johnson,

Administrator.

■ For the reasons stated in the preamble, title 40, chapter I, of the Code of Federal Regulations is amended as follows:

PART 60—[AMENDED]

■ 1. The authority citation for part 60 continues to read as follows:

Authority: 42 U.S.C., 7401, *et seq.*

Subpart A—[Amended]

■ 2. Section 60.18 is amended:

■ a. By revising the section heading;

■ b. By revising paragraph (a); and

■ c. By adding paragraphs (g), (h), and (i) to read as follows:

§ 60.18 General control device and work practice requirements.

(a) *Introduction.* (1) This section contains requirements for control devices used to comply with applicable subparts of 40 CFR parts 60 and 61. The requirements are placed here for administrative convenience and apply only to facilities covered by subparts referring to this section.

(2) This section also contains requirements for an alternative work practice used to identify leaking equipment. This alternative work practice is placed here for administrative convenience and is available to all subparts in 40 CFR parts 60, 61, 63, and 65 that require monitoring of equipment with a 40 CFR part 60, Appendix A–7, Method 21 monitor.

* * * * *

(g) *Alternative work practice for monitoring equipment for leaks.* Paragraphs (g), (h), and (i) of this section apply to all equipment for which the applicable subpart requires monitoring with a 40 CFR part 60, Appendix A–7, Method 21 monitor, except for closed vent systems, equipment designated as leakless, and equipment identified in the applicable subpart as having no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background. An owner or operator may use an optical gas imaging instrument instead of a 40 CFR part 60, Appendix A–7, Method 21 monitor. Requirements in the existing subparts that are specific to the Method 21 instrument do not apply under this section. All other requirements in the applicable subpart that are not addressed in paragraphs (g), (h), and (i) of this section apply to this standard. For example, equipment specification requirements, and non-Method 21 instrument recordkeeping and reporting requirements in the applicable subpart continue to apply. The terms defined in paragraphs (g)(1) through (5) of this section have meanings that are specific to the alternative work practice standard in paragraphs (g), (h), and (i) of this section.

(1) *Applicable subpart* means the subpart in 40 CFR parts 60, 61, 63, or 65 that requires monitoring of equipment with a 40 CFR part 60, Appendix A–7, Method 21 monitor.

(2) *Equipment* means pumps, valves, pressure relief valves, compressors, open-ended lines, flanges, connectors, and other equipment covered by the applicable subpart that require monitoring with a 40 CFR part 60, Appendix A–7, Method 21 monitor.

(3) *Imaging* means making visible emissions that may otherwise be invisible to the naked eye.

(4) *Optical gas imaging instrument* means an instrument that makes visible emissions that may otherwise be invisible to the naked eye.

(5) *Repair* means that equipment is adjusted, or otherwise altered, in order to eliminate a leak.

(6) *Leak* means:

(i) Any emissions imaged by the optical gas instrument;

(ii) Indications of liquids dripping;

(iii) Indications by a sensor that a seal or barrier fluid system has failed; or

(iv) Screening results using a 40 CFR part 60, Appendix A–7, Method 21 monitor that exceed the leak definition in the applicable subpart to which the equipment is subject.

(h) The alternative work practice standard for monitoring equipment for leaks is available to all subparts in 40 CFR parts 60, 61, 63, and 65 that require monitoring of equipment with a 40 CFR part 60, Appendix A–7, Method 21 monitor.

(1) An owner or operator of an affected source subject to CFR parts 60, 61, 63, or 65 can choose to comply with the alternative work practice requirements in paragraph (i) of this section instead of using the 40 CFR part 60, Appendix A–7, Method 21 monitor to identify leaking equipment. The owner or operator must document the equipment, process units, and facilities for which the alternative work practice will be used to identify leaks.

(2) Any leak detected when following the leak survey procedure in paragraph (i)(3) of this section must be identified for repair as required in the applicable subpart.

(3) If the alternative work practice is used to identify leaks, re-screening after an attempted repair of leaking equipment must be conducted using either the alternative work practice or the 40 CFR part 60, Appendix A–7, Method 21 monitor at the leak definition required in the applicable subpart to which the equipment is subject.

(4) The schedule for repair is as required in the applicable subpart.

(5) When this alternative work practice is used for detecting leaking equipment, choose one of the monitoring frequencies listed in Table 1 to subpart A of this part in lieu of the monitoring frequency specified for regulated equipment in the applicable subpart. Reduced monitoring frequencies for good performance are not applicable when using the alternative work practice.

(6) When this alternative work practice is used for detecting leaking equipment the following are not applicable for the equipment being monitored:

(i) Skip period leak detection and repair;

(ii) Quality improvement plans; or

(iii) Complying with standards for allowable percentage of valves and pumps to leak.

(7) When the alternative work practice is used to detect leaking equipment, the regulated equipment in paragraph (h)(1)(i) of this section must also be monitored annually using a 40 CFR part 60, Appendix A–7, Method 21 monitor at the leak definition required in the applicable subpart. The owner or operator may choose the specific monitoring period (for example, first quarter) to conduct the annual monitoring. Subsequent monitoring must be conducted every 12 months from the initial period. Owners or operators must keep records of the annual Method 21 screening results, as specified in paragraph (i)(4)(vii) of this section.

(i) An owner or operator of an affected source who chooses to use the alternative work practice must comply with the requirements of paragraphs (i)(1) through (i)(5) of this section.

(1) Instrument Specifications. The optical gas imaging instrument must comply with the requirements in (i)(1)(i) and (i)(1)(ii) of this section.

(i) Provide the operator with an image of the potential leak points for each piece of equipment at both the detection sensitivity level and within the distance used in the daily instrument check described in paragraph (i)(2) of this section. The detection sensitivity level depends upon the frequency at which leak monitoring is to be performed.

(ii) Provide a date and time stamp for video records of every monitoring event.

(2) Daily Instrument Check. On a daily basis, and prior to beginning any leak monitoring work, test the optical gas imaging instrument at the mass flow rate determined in paragraph (i)(2)(i) of this section in accordance with the procedure specified in paragraphs (i)(2)(ii) through (i)(2)(iv) of this section for each camera configuration used during monitoring (for example, different lenses used), unless an alternative method to demonstrate daily instrument checks has been approved in accordance with paragraph (i)(2)(v) of this section.

(i) Calculate the mass flow rate to be used in the daily instrument check by following the procedures in paragraphs (i)(2)(i)(A) and (i)(2)(i)(B) of this section.

(A) For a specified population of equipment to be imaged by the instrument, determine the piece of equipment in contact with the lowest mass fraction of chemicals that are detectable, within the distance to be used in paragraph (i)(2)(iv)(B) of this section, at or below the standard detection sensitivity level.

(B) Multiply the standard detection sensitivity level, corresponding to the selected monitoring frequency in Table 1 of subpart A of this part, by the mass fraction of detectable chemicals from the stream identified in paragraph (i)(2)(i)(A) of this section to determine the mass flow rate to be used in the daily instrument check, using the following equation.

$$E_{dic} = (E_{sds}) \sum_{i=1}^{k} x_i$$

Where:

E_{dic} = Mass flow rate for the daily instrument check, grams per hour

x_i = Mass fraction of detectable chemical(s) i seen by the optical gas imaging instrument, within the distance to be used in paragraph (i)(2)(iv)(B) of this section, at or below the standard detection sensitivity level, E_{sds}.

E_{sds} = Standard detection sensitivity level from Table 1 to subpart A, grams per hour

k = Total number of detectable chemicals emitted from the leaking equipment and seen by the optical gas imaging instrument.

(ii) Start the optical gas imaging instrument according to the manufacturer's instructions, ensuring that all appropriate settings conform to the manufacturer's instructions.

(iii) Use any gas chosen by the user that can be viewed by the optical gas imaging instrument and that has a purity of no less than 98 percent.

(iv) Establish a mass flow rate by using the following procedures:

(A) Provide a source of gas where it will be in the field of view of the optical gas imaging instrument.

(B) Set up the optical gas imaging instrument at a recorded distance from the outlet or leak orifice of the flow meter that will not be exceeded in the actual performance of the leak survey. Do not exceed the operating parameters of the flow meter.

(C) Open the valve on the flow meter to set a flow rate that will create a mass emission rate equal to the mass rate specified in paragraph (i)(2)(i) of this section while observing the gas flow through the optical gas imaging instrument viewfinder. When an image of the gas emission is seen through the viewfinder at the required emission rate, make a record of the reading on the flow meter.

(v) Repeat the procedures specified in paragraphs (i)(2)(ii) through (i)(2)(iv) of this section for each configuration of the optical gas imaging instrument used during the leak survey.

(vi) To use an alternative method to demonstrate daily instrument checks, apply to the Administrator for approval of the alternative under § 60.13(i).

(3) Leak Survey Procedure. Operate the optical gas imaging instrument to image every regulated piece of equipment selected for this work practice in accordance with the instrument manufacturer's operating parameters. All emissions imaged by the optical gas imaging instrument are considered to be leaks and are subject to repair. All emissions visible to the naked eye are also considered to be leaks and are subject to repair.

(4) Recordkeeping. You must keep the records described in paragraphs (i)(4)(i) through (i)(4)(vii) of this section:

(i) The equipment, processes, and facilities for which the owner or operator chooses to use the alternative work practice.

(ii) The detection sensitivity level selected from Table 1 to subpart A of this part for the optical gas imaging instrument.

(iii) The analysis to determine the piece of equipment in contact with the lowest mass fraction of chemicals that are detectable, as specified in paragraph (i)(2)(i)(A) of this section.

(iv) The technical basis for the mass fraction of detectable chemicals used in the equation in paragraph (i)(2)(i)(B) of this section.

(v) The daily instrument check. Record the distance, per paragraph (i)(2)(iv)(B) of this section, and the flow meter reading, per paragraph (i)(2)(iv)(C) of this section, at which the leak was imaged. Keep a video record of the daily instrument check for each configuration of the optical gas imaging instrument used during the leak survey (for example, the daily instrument check must be conducted for each lens used). The video record must include a time and date stamp for each daily instrument check. The video record must be kept for 5 years.

(vi) Recordkeeping requirements in the applicable subpart. A video record must be used to document the leak survey results. The video record must include a time and date stamp for each monitoring event. A video record can be used to meet the recordkeeping requirements of the applicable subparts if each piece of regulated equipment selected for this work practice can be

identified in the video record. The video record must be kept for 5 years.

(vii) The results of the annual Method 21 screening required in paragraph (h)(7) of this section. Records must be kept for all regulated equipment specified in paragraph (h)(1) of this section. Records must identify the equipment screened, the screening value measured by Method 21, the time and date of the screening, and calibration information required in the existing applicable subpart.

(5) Reporting. Submit the reports required in the applicable subpart. Submit the records of the annual Method 21 screening required in paragraph (h)(7) of this section to the Administrator via e-mail to *CCG-AWP@EPA.GOV*.

3. Subpart A is amended by adding Table 1 to subpart A to read as follows:

TABLE 1 TO SUBPART A TO PART 60—DETECTION SENSITIVITY LEVELS (GRAMS PER HOUR)

Monitoring frequency per subpart [a]	Detection sensitivity level
Bi-Monthly	60
Semi-Quarterly	85
Monthly	100

[a] When this alternative work practice is used to identify leaking equipment, the owner or operator must choose one of the monitoring frequencies listed in this table in lieu of the monitoring frequency specified in the applicable subpart. Bi-monthly means every other month. Semi-quarterly means twice per quarter. Monthly means once per month.

PART 63—[AMENDED]

■ 4. The authority citation for part 63 continues to read as follows:

Authority: 42 U.S.C., 7401, *et seq.*

Subpart A—[Amended]

■ 5. Section 63.11 is amended:
■ a. By revising the section heading;
■ b. By revising paragraph (a); and
■ c. By adding paragraphs (c), (d), and (e) to read as follows:

§ 63.11 Control device and work practice requirements.

(a) *Applicability.* (1) The applicability of this section is set out in § 63.1(a)(4).

(2) This section contains requirements for control devices used to comply with applicable subparts of this part. The requirements are placed here for administrative convenience and apply only to facilities covered by subparts referring to this section.

(3) This section also contains requirements for an alternative work practice used to identify leaking equipment. This alternative work practice is placed here for administrative convenience and is available to all subparts in 40 CFR parts 60, 61, 63, and 65 that require monitoring of equipment with a 40 CFR part 60, Appendix A–7, Method 21 monitor.

* * * * *

(c) *Alternative Work Practice for Monitoring Equipment for Leaks.* Paragraphs (c), (d), and (e) of this section apply to all equipment for which the applicable subpart requires monitoring with a 40 CFR part 60, Appendix A–7, Method 21 monitor, except for closed vent systems, equipment designated as leakless, and equipment identified in the applicable subpart as having no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background. An owner or operator may use an optical gas imaging instrument instead of a 40 CFR part 60, Appendix A–7, Method 21 monitor. Requirements in the existing subparts that are specific to the Method 21 instrument do not apply under this section. All other requirements in the applicable subpart that are not addressed in paragraphs (c), (d), and (e) of this section continue to apply. For example, equipment specification requirements, and non-Method 21 instrument recordkeeping and reporting requirements in the applicable subpart continue to apply. The terms defined in paragraphs (c)(1) through (5) of this section have meanings that are specific to the alternative work practice standard in paragraphs (c), (d), and (e) of this section.

(1) *Applicable subpart* means the subpart in 40 CFR parts 60, 61, 63, and 65 that requires monitoring of equipment with a 40 CFR part 60, Appendix A–7, Method 21 monitor.

(2) *Equipment* means pumps, valves, pressure relief valves, compressors, open-ended lines, flanges, connectors, and other equipment covered by the applicable subpart that require monitoring with a 40 CFR part 60, Appendix A–7, Method 21 monitor.

(3) *Imaging* means making visible emissions that may otherwise be invisible to the naked eye.

(4) *Optical gas imaging instrument* means an instrument that makes visible emissions that may otherwise be invisible to the naked eye.

(5) *Repair* means that equipment is adjusted, or otherwise altered, in order to eliminate a leak.

(6) *Leak* means:

(i) Any emissions imaged by the optical gas instrument;

(ii) Indications of liquids dripping;

(iii) Indications by a sensor that a seal or barrier fluid system has failed; or

(iv) Screening results using a 40 CFR part 60, Appendix A–7, Method 21 monitor that exceed the leak definition in the applicable subpart to which the equipment is subject.

(d) The alternative work practice standard for monitoring equipment for leaks is available to all subparts in 40 CFR parts 60, 61, 63, and 65 that require monitoring of equipment with a 40 CFR part 60, Appendix A–7, Method 21 monitor.

(1) An owner or operator of an affected source subject to 40 CFR parts 60, 61, 63, or 65 can choose to comply with the alternative work practice requirements in paragraph (e) of this section instead of using the 40 CFR part 60, Appendix A–7, Method 21 monitor to identify leaking equipment. The owner or operator must document the equipment, process units, and facilities for which the alternative work practice will be used to identify leaks.

(2) Any leak detected when following the leak survey procedure in paragraph (e)(3) of this section must be identified for repair as required in the applicable subpart.

(3) If the alternative work practice is used to identify leaks, re-screening after an attempted repair of leaking equipment must be conducted using either the alternative work practice or the 40 CFR part 60, Appendix A–7, Method 21 monitor at the leak definition required in the applicable subparts to which the equipment is subject.

(4) The schedule for repair is as required in the applicable subpart.

(5) When this alternative work practice is used for detecting leaking equipment, choose one of the monitoring frequencies listed in Table 1 to subpart A of this part in lieu of the monitoring frequency specified for regulated equipment in the applicable subpart. Reduced monitoring frequencies for good performance are not applicable when using the alternative work practice.

(6) When this alternative work practice is used for detecting leaking equipment, the following are not applicable for the equipment being monitored:

(i) Skip period leak detection and repair;

(ii) Quality improvement plans; or

(iii) Complying with standards for allowable percentage of valves and pumps to leak.

(7) When the alternative work practice is used to detect leaking equipment, the regulated equipment in paragraph (d)(1)(i) of this section must also be

monitored annually using a 40 CFR part 60, Appendix A–7, Method 21 monitor at the leak definition required in the applicable subpart. The owner or operator may choose the specific monitoring period (for example, first quarter) to conduct the annual monitoring. Subsequent monitoring must be conducted every 12 months from the initial period. Owners or operators must keep records of the annual Method 21 screening results, as specified in paragraph (i)(4)(vii) of this section.

(e) An owner or operator of an affected source who chooses to use the alternative work practice must comply with the requirements of paragraphs (e)(1) through (e)(5) of this section.

(1) Instrument Specifications. The optical gas imaging instrument must comply with the requirements specified in paragraphs (e)(1)(i) and (e)(1)(ii) of this section.

(i) Provide the operator with an image of the potential leak points for each piece of equipment at both the detection sensitivity level and within the distance used in the daily instrument check described in paragraph (e)(2) of this section. The detection sensitivity level depends upon the frequency at which leak monitoring is to be performed.

(ii) Provide a date and time stamp for video records of every monitoring event.

(2) Daily Instrument Check. On a daily basis, and prior to beginning any leak monitoring work, test the optical gas imaging instrument at the mass flow rate determined in paragraph (e)(2)(i) of this section in accordance with the procedure specified in paragraphs (e)(2)(ii) through (e)(2)(iv) of this section for each camera configuration used during monitoring (for example, different lenses used), unless an alternative method to demonstrate daily instrument checks has been approved in accordance with paragraph (e)(2)(v) of this section.

(i) Calculate the mass flow rate to be used in the daily instrument check by following the procedures in paragraphs (e)(2)(i)(A) and (e)(2)(i)(B) of this section.

(A) For a specified population of equipment to be imaged by the instrument, determine the piece of equipment in contact with the lowest mass fraction of chemicals that are detectable, within the distance to be used in paragraph (e)(2)(iv)(B) of this section, at or below the standard detection sensitivity level.

(B) Multiply the standard detection sensitivity level, corresponding to the selected monitoring frequency in Table 1 of subpart A of this part, by the mass fraction of detectable chemicals from the stream identified in paragraph (e)(2)(i)(A) of this section to determine the mass flow rate to be used in the daily instrument check, using the following equation.

$$E_{dic} = (E_{sds}) \sum_{i=1}^{k} x_i$$

Where:

E_{dic} = Mass flow rate for the daily instrument check, grams per hour

x_i = Mass fraction of detectable chemical(s) i seen by the optical gas imaging instrument, within the distance to be used in paragraph (e)(2)(iv)(B) of this section, at or below the standard detection sensitivity level, E_{sds}.

E_{sds} = Standard detection sensitivity level from Table 1 to subpart A, grams per hour

k = Total number of detectable chemicals emitted from the leaking equipment and seen by the optical gas imaging instrument.

(ii) Start the optical gas imaging instrument according to the manufacturer's instructions, ensuring that all appropriate settings conform to the manufacturer's instructions.

(iii) Use any gas chosen by the user that can be viewed by the optical gas imaging instrument and that has a purity of no less than 98 percent.

(iv) Establish a mass flow rate by using the following procedures:

(A) Provide a source of gas where it will be in the field of view of the optical gas imaging instrument.

(B) Set up the optical gas imaging instrument at a recorded distance from the outlet or leak orifice of the flow meter that will not be exceeded in the actual performance of the leak survey. Do not exceed the operating parameters of the flow meter.

(C) Open the valve on the flow meter to set a flow rate that will create a mass emission rate equal to the mass rate calculated in paragraph (e)(2)(i) of this section while observing the gas flow through the optical gas imaging instrument viewfinder. When an image of the gas emission is seen through the viewfinder at the required emission rate, make a record of the reading on the flow meter.

(v) Repeat the procedures specified in paragraphs (e)(2)(ii) through (e)(2)(iv) of this section for each configuration of the optical gas imaging instrument used during the leak survey.

(vi) To use an alternative method to demonstrate daily instrument checks, apply to the Administrator for approval of the alternative under § 63.177 or § 63.178, whichever is applicable.

(3) Leak Survey Procedure. Operate the optical gas imaging instrument to image every regulated piece of equipment selected for this work practice in accordance with the instrument manufacturer's operating parameters. All emissions imaged by the optical gas imaging instrument are considered to be leaks and are subject to repair. All emissions visible to the naked eye are also considered to be leaks and are subject to repair.

(4) Recordkeeping. Keep the records described in paragraphs (e)(4)(i) through (e)(4)(vii) of this section:

(i) The equipment, processes, and facilities for which the owner or operator chooses to use the alternative work practice.

(ii) The detection sensitivity level selected from Table 1 to subpart A of this part for the optical gas imaging instrument.

(iii) The analysis to determine the piece of equipment in contact with the lowest mass fraction of chemicals that are detectable, as specified in paragraph (e)(2)(i)(A) of this section.

(iv) The technical basis for the mass fraction of detectable chemicals used in the equation in paragraph (e)(2)(i)(B) of this section.

(v) The daily instrument check. Record the distance, per paragraph (e)(2)(iv)(B) of this section, and the flow meter reading, per paragraph (e)(2)(iv)(C) of this section, at which the leak was imaged. Keep a video record of the daily instrument check for each configuration of the optical gas imaging instrument used during the leak survey (for example, the daily instrument check must be conducted for each lens used). The video record must include a time and date stamp for each daily instrument check. The video record must be kept for 5 years.

(vi) Recordkeeping requirements in the applicable subpart. A video record must be used to document the leak survey results. The video record must include a time and date stamp for each monitoring event. A video record can be used to meet the recordkeeping requirements of the applicable subparts if each piece of regulated equipment selected for this work practice can be identified in the video record. The video record must be kept for 5 years.

(vii) The results of the annual Method 21 screening required in paragraph (h)(7) of this section. Records must be kept for all regulated equipment specified in paragraph (h)(1) of this section. Records must identify the equipment screened, the screening value measured by Method 21, the time and date of the screening, and calibration information required in the existing applicable subparts.

(5) Reporting. Submit the reports required in the applicable subpart.

Submit the records of the annual Method 21 screening required in paragraph (h)(7) of this section to the Administrator via e-mail to *CCG-AWP@EPA.GOV*.

■ 6. Subpart A is amended by adding Table 1 to subpart A to read as follows:

TABLE 1 TO SUBPART A OF PART 63—DETECTION SENSITIVITY LEVELS (GRAMS PER HOUR)

Monitoring frequency per subpart [a]	Detection sensitivity level
Bi-Monthly	60

TABLE 1 TO SUBPART A OF PART 63—DETECTION SENSITIVITY LEVELS (GRAMS PER HOUR)—Continued

Monitoring frequency per subpart [a]	Detection sensitivity level
Semi-Quarterly	85
Monthly	100

[a] When this alternative work practice is used to identify leaking equipment, the owner or operator must choose one of the monitoring frequencies listed in this table, in lieu of the monitoring frequency specified in the applicable subpart. Bi-monthly means every other month. Semi-quarterly means twice per quarter. Monthly means once per month.

Subpart G—[Amended]

■ 7. Table 1A to subpart G is amended by adding a new entry in numerical order for "§ 63.11 (c), (d), and (e)" to read as follows:

TABLE 1A TO SUBPART G OF PART 63—APPLICABLE 40 CFR PART 63 GENERAL PROVISIONS

40 CFR part 63, subpart A, provisions applicable to subpart G
* * * * * * *
§ 63.11 (c), (d), and (e)
* * * * * * *

Subpart H—[Amended]

■ 8. Table 4 to subpart H is amended by adding a new entry in numerical order for "§ 63.11 (c), (d), and (e)" to read as follows:

TABLE 4 TO SUBPART H OF PART 63—APPLICABLE 40 CFR PART 63 GENERAL PROVISIONS

40 CFR part 63, subpart H, provisions applicable to subpart H
* * * * * * *
§ 63.11 (c), (d), and (e)
* * * * * * *

Subpart R—[Amended]

■ 9. Table 1 to subpart R is amended by adding a new entry in numerical order for "§ 63.11 (c), (d), and (e)" to read as follows:

TABLE 1 TO SUBPART R OF PART 63—GENERAL PROVISIONS APPLICABILITY TO SUBPART R

Reference	Applies to subpart R	Comment
* * * * * * *		
§ 63.11 (c), (d), and (e)	Yes.	
* * * * * * *		

Subpart U—[Amended]

■ 10. Table 1 to subpart U is amended by revising the entry for "§ 63.11" to read as follows:

TABLE 1 TO SUBPART U OF PART 63—APPLICABILITY OF GENERAL PROVISIONS TO SUBPART U AFFECTED SOURCES

Reference	Applies to subpart U	Explanation
* * *	* * *	* * *
§ 63.11	Yes	§ 63.11(b) specifies requirements for flares used to comply with provisions of this subpart. § 63.504(c) contains the requirements to conduct compliance demonstrations for flares subject to this subpart. § 63.11(c), (d), and (e) specifies requirements for an alternative work practice for equipment leaks.
* * *	* * *	* * *

Subpart HH—[Amended]

■ 11. Table 2 to subpart HH is amended by adding a new entry in numerical order for "§ 63.11 (c), (d), and (e)" to read as follows:

TABLE 2 TO SUBPART HH OF PART 63—APPLICABILITY OF 40 CFR PART 63 GENERAL PROVISIONS TO SUBPART HH

General provisions reference	Applicable to subpart HH	Explanation
* * *	* * *	* * *
§ 63.11(c), (d), and (e)	Yes.	
* * *	* * *	* * *

Subpart GGG—[Amended]

■ 12. Table 1 to subpart GGG is amended by revising the entry for "§ 63.11" to read as follows:

TABLE 1 TO SUBPART GGG OF PART 63—GENERAL PROVISIONS APPLICABILITY TO SUBPART GGG

General provisions reference	Summary of requirements	Applies to subpart GGG	Comments
* * *	* * *	* * *	* * *
§ 63.11	Control device and equipment leak work practice requirements.	Yes.	
* * *	* * *	* * *	* * *

Subpart HHH—[Amended]

■ 13. Table 2 to the appendix to subpart HHH is amended by adding a new entry in numerical order for "§ 63.11 (c), (d), and (e)" to read as follows:

APPENDIX: TABLE 2 TO SUBPART HHH OF PART 63—APPLICABILITY OF 40 CFR PART 63 GENERAL PROVISIONS TO SUBPART HHH

General provisions reference	Applicable to subpart HHH	Explanation
* * *	* * *	* * *
§ 63.11(c), (d), and (e)	Yes.	
* * *	* * *	* * *

Subpart JJJ—[Amended]

■ 14. Table 1 to subpart JJJ is amended by revising the entry for "§ 63.11" to read as follows:

TABLE 1 TO SUBPART JJJ OF PART 63—APPLICABILITY OF GENERAL PROVISIONS TO SUBPART JJJ AFFECTED SOURCES

Reference	Applies to Subpart JJJ	Explanation
* * *	* * *	* * *
§ 63.11	Yes	§ 63.11(b) specifies requirements for flares used to comply with provisions of this subpart. § 63.1333(e) contains the requirements to conduct compliance demonstrations for flares subject to this subpart. § 63.11(c), (d), and (e) specifies requirements for an alternative work practice for equipment leaks.
* * *	* * *	* * *

Subpart VVV—[Amended]

■ 15. Table 1 to subpart VVV is amended by adding a new entry in numerical order for "63.11 (c), (d), and (e)", and by revising the entry for "§ 63.11" to read as follows:

TABLE 1 TO SUBPART VVV OF PART 63—APPLICABILITY OF 40 CFR PART 63 GENERAL PROVISIONS TO SUBPART VVV

General provisions reference	Applicable to subpart VVV	Explanation
* * *	* * *	* * *
§ 63.11	Yes	Control device and equipment leak work practice requirements.
* * *	* * *	* * *
§ 63.11(c), (d) and (e)	Yes	Alternative work practice for equipment leaks.
* * *	* * *	* * *

Subpart EEEE—[Amended]

■ 16. Table 12 to subpart EEEE is amended by adding a new entry in numerical order for "§ 63.11 (c), (d), and (e)" to read as follows:

TABLE 12 TO SUBPART EEEE OF PART 63–APPLICABILITY OF GENERAL PROVISIONS TO SUBPART EEEE

Citation	Subject	Brief description	Applies to subpart EEEE
* * *	* * *	* * *	* * *
§ 63.11(c), (d), and (e)	Control and work practice requirements.	Alternative work practice for equipment leaks.	Yes.
* * *	* * *	* * *	* * *

Subpart FFFF—[Amended]

■ 17. Table 12 to subpart FFFF is amended by revising the entry for "§ 63.11" to read as follows:

TABLE 12 TO SUBPART FFFF OF PART 63—APPLICABILITY OF GENERAL PROVISIONS TO SUBPART FFFF

Citation	Subject	Explanation
* * *	* * *	* * *
§ 63.11	Control device requirements for flares and work practice requirements for equipment leaks.	Yes.
* * *	* * *	* * *

Subpart UUUU—[Amended]

■ 18. Table 10 to subpart UUUU is amended by revising the entry for "§ 63.11" to read as follows:

TABLE 10 TO SUBPART UUUU OF PART 63—APPLICABILITY OF GENERAL PROVISIONS TO SUBPART UUUU

Citation	Subject	Brief description	Applies to Subpart UUUU
* * *	* * *	* * *	* * *
§ 63.11	Control and work practice requirements.	Requirements for flares and alternative work practice for equipment leaks.	Yes.
* * *	* * *	* * *	* * *

Subpart GGGGG—[Amended]

■ 19. Table 3 to subpart GGGGG is amended by revising the entry for "§ 63.11" to read as follows:

TABLE 3 TO SUBPART GGGGG OF PART 63—APPLICABILITY OF GENERAL PROVISIONS TO SUBPART GGGGG

Citation	Subject	Brief description	Applies to subpart GGGGG
* * *	* * *	* * *	* * *
§ 63.11	Control and work practice requirements.	Requirements for flares and alternative work practice for equipment leaks.	Yes
* * *	* * *	* * *	* * *

Subpart HHHHH—[Amended]

■ 20. Table 10 to subpart HHHHH is amended by revising the entry for "§ 63.11" to read as follows:

TABLE 10 TO SUBPART HHHHH OF PART 63—APPLICABILITY OF GENERAL PROVISIONS TO SUBPART HHHHH

Citation	Subject	Explanation
* * *	* * *	* * *
§ 63.11	Control and work practice requirements	Yes
* * *	* * *	* * *

PART 65—[Amended]

■ 21. The authority citation for part 65 continues to read as follows:

Authority: 42 U.S.C., 7401, *et seq.*

Subpart A—[Amended]

■ 22. Section 65.7 is amended:
■ a. By revising the section heading;
■ b. By adding a new sentence to the end of paragraph (b); and
■ c. By adding paragraphs (e), (f), and (g) to read as follows:

§ 65.7 Monitoring, recordkeeping, and reporting waivers and alternatives, and alternative work practice for equipment leaks.

* * * * *

(b) * * * Owners and operators are also provided the option of complying with an alternative work practice for monitoring leaking equipment in § 65.7 (e), (f), and (g) rather than monitoring equipment with a 40 CFR part 60, Appendix A–7, Method 21 monitor.

* * * * *

(e) *Alternative work practice for monitoring equipment for leaks.* This section contains requirements for an alternative work practice used to identify leaking equipment. This alternative work practice is placed here for administrative convenience and is available to all subparts in 40 CFR parts 60, 61, 63, and 65 that require monitoring of equipment with a 40 CFR part 60, Appendix A–7, Method 21 monitor. Paragraphs (e), (f), and (g) of this section apply to all equipment for which the applicable subpart requires monitoring with a 40 CFR part 60, Appendix A–7, Method 21 monitor, except for closed vent systems, equipment designated as leakless, and equipment identified in the applicable subpart as having no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background. An owner or operator may use an optical gas imaging instrument instead of a 40 CFR part 60, Appendix A–7, Method 21 monitor. Requirements in the existing subparts that are specific to the Method 21 instrument do not apply under this section. All other requirements in the applicable subpart that are not addressed in paragraphs (e), (f), and (g) of this section continue to apply. For example, equipment specification requirements, and non-Method 21 instrument recordkeeping and reporting requirements in the applicable subpart continue to apply. The terms defined in paragraphs (e)(1) through (5) of this section have meanings that are specific to the alternative work practice standard in paragraphs (e), (f), and (g) of this section.

(1) *Applicable subpart* means the subpart in 40 CFR parts 60, 61, 63, and 65 that requires monitoring of each piece of equipment with a 40 CFR part 60, Appendix A–7, Method 21 monitor.

(2) *Equipment* means pumps, valves, pressure relief valves, compressors, open-ended lines, flanges, connectors, and other equipment covered by the applicable subpart that require monitoring with a 40 CFR part 60, Appendix A–7, Method 21 monitor.

(3) *Imaging* means making visible emissions that may otherwise be invisible to the naked eye.

(4) *Optical gas imaging instrument* means an instrument that makes visible emissions that may otherwise be invisible to the naked eye.

(5) *Repair* means that equipment is adjusted, or otherwise altered, in order to eliminate a leak.

(6) *Leak* means:

(i) Any emissions imaged by the optical gas instrument;

(ii) Indications of liquids dripping;

(iii) Indications by a sensor that a seal or barrier fluid system has failed; or

(iv) Screening results using a 40 CFR part 60, Appendix A–7, Method 21 monitor that exceed the leak definition in the applicable subpart to which the equipment is subject.

(f) The alternative work practice standard for monitoring equipment for leaks is available to all subparts in 40 CFR parts 60, 61, 63, and 65 that require monitoring of equipment with a 40 CFR part 60, Appendix A–7, Method 21 monitor.

(1) An owner or operator of an affected source subject to 40 CFR parts 60, 61, 63, or 65 can choose to comply with the alternative work practice requirements in paragraph (g) of this section instead of using the 40 CFR part 60, Appendix A–7, Method 21 monitor to identify leaking equipment. The owner or operator must document the equipment, process units, and facilities for which the alternative work practice will be used to identify leaks.

(2) Any leak detected when following the leak survey procedure in paragraph (g)(3) of this section must be identified for repair as required in the applicable subpart.

(3) If the alternative work practice is used to identify leaks, re-screening after an attempted repair of leaking equipment must be conducted using either the alternative work practice or the 40 CFR part 60, Appendix A–7, Method 21 monitor at the leak definition required in the applicable subparts to which the equipment is subject.

(4) The schedule for repair is as required in the applicable subpart.

(5) When this alternative work practice is used for detecting leaking equipment, choose one of the monitoring frequencies listed in Table 3 to subpart A of this part, in lieu of the monitoring frequency specified for regulated equipment in the applicable subpart. Reduced monitoring frequencies for good performance are not applicable when using the alternative work practice.

(6) When this alternative work practice is used for detecting leaking equipment, the following are not applicable for the equipment being monitored:

(i) Skip period leak detection and repair;

(ii) Quality improvement plans; or

(iii) Complying with standards for allowable percentage of valves and pumps to leak.

(7) When the alternative work practice is used to detect leaking equipment, the regulated equipment in paragraph (f)(1)(i) of this section must also be monitored annually using a 40 CFR part 60, Appendix A–7, Method 21 monitor at the leak definition required in the applicable subpart. The owner or operator may choose the specific

monitoring period (for example, first quarter) to conduct the annual monitoring. Subsequent monitoring must be conducted every 12 months from the initial period. Owners or operators must keep records of the annual Method 21 screening results, as specified in paragraph (i)(4)(vii) of this section.

(g) An owner or operator of an affected source who chooses to use the alternative work practice must comply with the requirements of paragraphs (g)(1) through (g)(5) of this section.

(1) Instrument Specifications. The optical gas imaging instrument must comply with the requirements specified in paragraphs (g)(1)(i) and (g)(1)(ii) of this section.

(i) Provide the operator with an image of the potential leak points for each piece of equipment at both the detection sensitivity level and within the distance used in the daily instrument check described in paragraph (g)(2) of this section. The detection sensitivity level depends upon the frequency at which leak monitoring is to be performed.

(ii) Provide a date and time stamp for video records of every monitoring event.

(2) Daily instrument check. On a daily basis, and prior to beginning any leak monitoring work, test the optical gas imaging instrument at the mass flow rate determined in paragraph (g)(2)(i) of this section in accordance with the procedure specified in paragraphs (g)(2)(ii) through (g)(2)(iv) of this section for each camera configuration used during monitoring (for example, different lenses used), unless an alternative method to demonstrate daily instrument checks has been approved in accordance with paragraph (g)(2)(v) of this section.

(i) Calculate the mass flow rate to be used in the daily instrument check by following the procedures in paragraphs (g)(2)(i)(A) and (g)(2)(i)(B) of this section.

(A) For a specified population of equipment to be imaged by the instrument, determine the piece of equipment in contact with the lowest mass fraction of chemicals that are detectable, within the distance to be used in paragraph (g)(2)(iv)(B) of this section, at or below the standard detection sensitivity level.

(B) Multiply the standard detection sensitivity level, corresponding to the selected monitoring frequency in Table 3 of subpart A of this part, by the mass fraction of detectable chemicals from the stream identified in paragraph (g)(2)(i)(A) of this section to determine the mass flow rate to be used in the daily instrument check, using the following equation.

$$E_{ddc} = (E_{sds}) \sum_{i=1}^{k} x_i$$

Where:

E_{ddc} = Mass flow rate for the daily instrument check, grams per hour

x_i = Mass fraction of detectable chemical(s) i seen by the optical gas imaging instrument, within the distance to be used in paragraph (g)(2)(iv)(B) of this section, at or below the standard detection sensitivity level, E_{sds}.

E_{sds} = Standard detection sensitivity level from Table 3 to subpart A, grams per hour

k = Total number of detectable chemicals emitted from the leaking equipment and seen by the optical gas imaging instrument.

(ii) Start the optical gas imaging instrument according to the manufacturer's instructions, ensuring that all appropriate settings conform to the manufacturer's instructions.

(iii) Use any gas chosen by the user that can be viewed by the optical gas imaging instrument and that has a purity of no less than 98 percent.

(iv) Establish a mass flow rate by using the following procedures:

(A) Provide a source of gas where it will be in the field of view of the optical gas imaging instrument.

(B) Set up the optical gas imaging instrument at a recorded distance from the outlet or leak orifice of the flow meter that will not be exceeded in the actual performance of the leak survey. Do not exceed the operating parameters of the flow meter.

(C) Open the valve on the flow meter to set a flow rate that will create a mass emission rate equal to the mass rate calculated in paragraph (g)(2)(i) of this section while observing the gas flow through the optical gas imaging instrument viewfinder. When an image of the gas emission is seen through the viewfinder at the required emission rate, make a record of the reading on the flow meter.

(v) Repeat the procedures specified in paragraphs (g)(2)(ii) through (g)(2)(iv) of this section for each configuration of the optical gas imaging instrument used during the leak survey.

(vi) To use an alternative method to demonstrate daily instrument checks, apply to the Administrator for approval of the alternative under § 65.7(b).

(3) Leak survey procedure. Operate the optical gas imaging instrument to image every regulated piece of equipment selected for this work practice in accordance with the instrument manufacturer's operating parameters. All emissions imaged by the optical gas imaging instrument are considered to be leaks and are subject to repair. All emissions visible to the naked eye are also considered to be leaks and are subject to repair.

(4) Recordkeeping. Keep the records described in paragraphs (g)(4)(i) through (g)(4)(vii) of this section:

(i) The equipment, processes, and facilities for which the owner or operator chooses to use the alternative work practice.

(ii) The detection sensitivity level selected from Table 3 to subpart A of this part for the optical gas imaging instrument.

(iii) The analysis to determine the piece of equipment in contact with the lowest mass fraction of chemicals that are detectable, as specified in paragraph (g)(2)(i)(A) of this section.

(iv) The technical basis for the mass fraction of detectable chemicals used in the equation in paragraph (g)(2)(i)(B) of this section.

(v) The daily instrument check. Record the distance, per paragraph (g)(2)(iv)(B) of this section, and the flow meter reading, per paragraph (g)(2)(iv)(C) of this section, at which the leak was imaged. Keep a video record of the daily instrument check for each configuration of the optical gas imaging instrument used during the leak survey (for example, the daily instrument check must be conducted for each lens used). The video record must include a time and date stamp for each daily instrument check. The video record must be kept for 5 years.

(vi) Recordkeeping requirements in the applicable subpart. A video record must be used to document the leak survey results. The video record must include a time and date stamp for each monitoring event. A video record can be used to meet the recordkeeping requirements of the applicable subparts if each piece of regulated equipment selected for this work practice can be identified in the video record. The video record must be kept for 5 years.

(vii) The results of the annual Method 21 screening required in paragraph (f)(7) of this section. Records must be kept for all regulated equipment specified in paragraph (f)(1) of this section. Records must identify the equipment screened, the screening value measured by Method 21, the time and date of the screening, and calibration information required in the existing applicable subparts.

(5) Reporting. Submit the reports required in the applicable subpart. Submit the records of the annual Method 21 screening required in paragraph (f)(7) of this section to the Administrator via e-mail to *CCG-AWP@EPA.GOV*.

■ 23. Subpart A is amended by adding Table 3 to subpart A of Part 65 to read as follows:

TABLE 3 TO SUBPART A OF PART 65—DETECTION SENSITIVITY LEVELS (GRAMS PER HOUR)

Monitoring Frequency per Subpart [a]	Detection Sensitivity Level
Bi-Monthly	60
Semi-Quarterly	85
Monthly	100

[a] When this alternative work practice is used to identify leaking equipment, the owner or operator must choose one of the monitoring frequencies listed in this table, in lieu of the monitoring frequency specified in the applicable subpart. Bi-monthly means every other month. Semi-quarterly means twice per quarter. Monthly means once per month.

[FR Doc. E8–30196 Filed 12–19–08; 8:45 am]

BILLING CODE 6560–50–P

Message

From: Lee Fuller [lfuller@ipaa.org]
Sent: 10/8/2019 2:19:07 AM
To: ssiffring@westernenergyalliance.org; jmsanchez@marathonoil.com; Jesse.Sandlin@nblenergy.com; Jagadeesan.Sethuraman@whiting.com; gretchen.kern@pxd.com; gschrab@sm-energy.com; Garvey, Megan [garvey.megan@epa.gov]; Lesley Schaaff [lschaaff@hess.com]
Subject: NSPS OOOOa Technical Revisions discussion

NSPS OOOOa Technical Revisions discussion
Scheduled: Tuesday, Oct 8, 2019 from 3:00 PM to 4:00 PM
Location: Western Energy Alliance conference room and call-in at Ex. 6 Personal Privacy (PP)
Invitees: Stuart Siffring, Jessica Sanchez, Jesse Sandlin, Jagadeesan Sethuraman, Gretchen Kern (gretchen.kern@pxd.com), Greg Schrab, garvey.megan@epa.gov

Sent from my iPhone

Appointment

From: Stuart Siffring [ssiffring@westernenergyalliance.org]
Sent: 10/7/2019 8:31:02 PM
To: Gretchen Kern (gretchen.kern@pxd.com) [gretchen.kern@pxd.com]; Jagadeesan Sethuraman [Jagadeesan.Sethuraman@whiting.com]; Jesse Sandlin [Jesse.Sandlin@nblenergy.com]; lfuller@ipaa.org; Jessica Sanchez [jmsanchez@marathonoil.com]; Greg Schrab [gschrab@sm-energy.com]; Garvey, Megan [garvey.megan@epa.gov]

Subject: NSPS OOOOa Technical Revisions discussion
Attachments: Joint Trades and EPA NSPS OOOOa Tech Agenda.docx
Location: Western Energy Alliance conference room and call-in at Ex. 6 Personal Privacy (PP)

Start: 10/8/2019 7:00:00 PM
End: 10/8/2019 8:00:00 PM
Show Time As: Tentative

Recurrence: (none)

Hello,

Attached is the agenda for our meeting to discuss the trade's comments on the NSPS OOOOa technical revisions. Call-in information is: 1 Ex. 6 Personal Privacy (PP) Thanks for your attendance,

-Stuart

Stuart Siffring, PE
Regulatory Analyst
Western Energy Alliance
1775 Sherman St. #2700
Denver, CO 80202
ssiffring@westernenergyalliance.org
303-501-1060

Message

From: Jagadeesan Sethuraman [Jagadeesan.Sethuraman@whiting.com]
Sent: 10/1/2019 2:49:07 PM
To: Garvey, Megan [garvey.megan@epa.gov]
CC: Gretchen Kern (gretchen.kern@pxd.com) (gretchen.kern@pxd.com) [gretchen.kern@pxd.com]; Gretchen Kern (gretchen.kern@pxd.com) (gretchen.kern@pxd.com) [gretchen.kern@pxd.com]; Stuart Siffring [ssiffring@westernenergyalliance.org]; Sanchez, Jessica M. (MRO) [jmsanchez@marathonoil.com]; Lee Fuller [lfuller@ipaa.org]
Subject: Meeting on the proposed NSPS OOOOa Technical Rule
Attachments: Joint Trades and EPA NSPS OOOOa Tech Agenda.docx

Good morning Megan,

Western Energy Alliance, Independent Petroleum Association of America, and American Exploration and Production Council members would like to meet with you to discuss the industry's comments for the proposed NSPS OOOOa Technical Rule. The purpose of this meeting is to review and explain the comments these trades have submitted on this proposed rule. An agenda for the meeting is attached. Our members are available next Tuesday (10/08) at 1:00 P.M. and we hope that this schedule works for you. Please let me know if we need to reschedule this meeting for any reason. We are proposing to meet at the Western Energy Alliance's office. We would appreciate it if you can check your availability and let us at your earliest convenience so that we can let our members know of this meeting.

Thanks,

Jagadeesan Sethuraman
Environmental Manager
Whiting Petroleum Corporation
and its wholly owned subsidiary
Whiting Oil and Gas Corporation
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The information contained in this message may be privileged and confidential and protected from disclosure. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by replying to this message and deleting it from your computer.

Message

From: Durrant, Marie [Marie.Durrant@pacificorp.com]
Sent: 8/27/2019 3:23:38 PM
To: aaverett@sunrise-eng.com; Adrienne.Sandoval@andeavor.com; amyc@utetribe.com; Angela.Zivkovich@anadarko.com; ashley@publiclandsolutions.org; bstringer@uintah.utah.gov; Rhammer@SLRconsulting.com; bmensinger@trinityconsultants.com; Chad.Schlichtemeier@anadarko.com; chelsea.cantrelle@epenergy.com; CColclasure@bwenergylaw.com; Dresser, Chris [Dresser.Chris@epa.gov]; Beeler, Cindy [Beeler.Cindy@epa.gov]; Smith, Claudia [Smith.Claudia@epa.gov]; Bean, Clayton [bean.clayton@epa.gov]; corey.jones@epenergy.com; Daniel.D.Pring@andeavor.com; dbrown@tricountyhealth.com; dmcneill@utah.gov; Ex. 6 Personal Privacy (PP); Douglas.Jordan@encana.com; Eoman@altamontenergy.com; eehrmantraut@SLRconsulting.com; evernon@blm.gov; gtodd@duchesne.utah.gov; huy.tran@usu.edu; jpatterson@ndnlaw.com; James.woodall@encana.com; jwoodland@crescentpointenergy.com; Jean.semborski@cop.com; joe.sager@epenergy.com; John.Spencer@simplot.com; Ex. 6 Personal Privacy (PP); jmathis@tricountyhealth.com; Karen_Pratt@xtoenergy.com; Lolsen@altamontenergy.com; Lexie Wilson [lexiewilson@utah.gov]; lonnief@utetribe.com; mbdurrant@rqn.com; mariek@utetribe.com; marc.mansfield@usu.edu; mberger@utah.gov; mstewart@redleafinc.com; Garvey, Megan [garvey.megan@epa.gov]; miken@utetribe.com; minnieg@utetribe.com; Morales, Monica [Morales.Monica@epa.gov]; Ex. 6 Personal Privacy (PP); rhrenko-browning@utahpetroleum.org; Ryan.Clerico@enefit.com; Ryan@kairosaerospace.com; Ryan.Swanson@epenergy.com; scottchew@le.utah.gov; Jackson, Scott [Jackson.Scott@epa.gov]; seth.lyman@usu.edu; svance@utah.gov; Spencer_Kimball@eogresources.com; ssiffring@westernenergyalliance.org; Thomas.H.Gibbons@andeavor.com; trang.tran@usu.edu; ttodd@utah.gov; val.oman@epenergy.com; vince.christensen@simplot.com; jmcqueen@crescentpointenergy.com; Andrea.Olsen@Simplot.com; Christopher Pennell [cpennell@utah.gov]; Nancy Daher [ndaher@utah.gov]; amatheson@utah.gov; wesadams@utah.gov; twiseman@utah.gov; randy.hughes@middleforkep.com; rob.zaback@middleforkep.com; Jillian.Yamartino@anadarko.com; lnelson@utah.gov; mmckee@7county.utah.gov
Subject: Agenda and Video/Call-in Info for Uinta Basin Ozone Working Group Meeting
Attachments: UINTA BASIN OZONE WORKING GROUP - Goals Objectives Procedures - Aug2019.....docx; 2019 0828 UBOWG Agenda.docx

Hi All,

Attached is the agenda for our meeting tomorrow at 2:30 pm as well as our mission statement and objectives with a few minor updates.

Hopefully most of you will be able to join in person. We will be meeting at USU just before the Uintah Basin Energy Summit begins.

Date: August 28, 2019
Time: 2:30 – 3:30
Location: B101, Bingham Research Center, USU, 320 N. Aggie Blvd., Vernal

If you can't make it in person, video and call-in information are below. Please contact me Ex. 6 Personal Privacy (PP) or Seth Lyman Ex. 6 Personal Privacy (PP) if you are having problems connecting.

Uinta Basin Ozone Working Group

Wednesday, Aug 28, 2019 2:30 pm | 1 hour | (UTC-07:00) Mountain Time (US & Canada)
Meeting number: Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP)

Join by video system
Dial Ex. 6 Personal Privacy (PP)

You can also dial 173.243.2.68 and enter your meeting number.

Join by phone

Ex. 6 Personal Privacy (PP)

Marie

Marie Bradshaw Durrant
Sr. Attorney (Environment)
PacifiCorp
801-220-4707
Mobile: Ex. 6 Personal Privacy (PP)

Uinta Basin Ozone Working Group Meeting
August 28, 2019

1. Introductions
    a. New group coordinator and steering committee member
    b. Updates to Mission/Objectives
2. Utah DAQ updates on inventory and modeling
3. EPA updates:
    a. CAA requirements for likely moderate level bump-up
    b. FIP
    c. ERC Banking Rule
4. BLM general conformity updates and impacts if nonattainment level is increased
5. Overview: Air quality panel presenting at Uintah Basin Energy Summit
6. Next steps for winter ozone events reporting and LORA award
7. Other actions/items for the coming winter

UINTA BASIN OZONE WORKING GROUP ("UBOWG") MISSION, OBJECTIVES, AND PROCEDURES

1. Mission Statement:

Mission Statement: The Uinta Basin Ozone Working Group is a collaborative forum to facilitate attainment of the ozone standard in the Uinta Basin. The Group includes representation from non-federal government decision-makers in the Uinta Basin, regulators, stakeholders, and experts. Federal and State regulators participate in group meetings but not group decision-making. We aim to find and support solutions through increased understanding of high ozone incidents in the Basin, improved communication, and exploration of known and novel responses.

2. Short-term and long-term objectives

Background Note: UBOWG recognizes that it does not have authority to make or demand policy or regulations governing sources in the Uinta Basin.

Short Term:

1. Assemble information and analyses to better understand contributing factors that lead to high ozone incidents.
2. Finalize list of voluntary actions that can be taken during the 2018-2019 winter ozone season and find ways to record, reward, and recognize these actions.
    a. Explore activists' offer to produce publicity piece
    b. Improve upon 2013 efforts by tracking and reporting
    c. Expand parties involved and awareness of actions proposed and taken
3. Foster communication between different sub-groups to increase awareness and understanding.

Long-Term:

1. Improve the accuracy of inventories and modeling.
2. Explore reasonable pathways to decrease high ozone incidents.
3. Assemble and provide informative and accurate updates about actions being taken.

3. Procedures and Framework for Action/Work Products

Decision-Making Framework:

1. The Steering Committee will develop and guide the UBOWG agenda and working focus.
    a. Steering Committee is composed of 1 representative each from 1) Ute Tribe, 2) industry (four representatives with a sole unified vote), 3) county and municipal government, 4) environmental and community advocacy groups, 5) technical and academic groups.
    b. The UBOWG will only take group action if approved by full consensus of the Steering Committee.
    c. If consensus cannot be reached, UBOWG will not undertake formal group action on that topic or issue.

2. UBOWG will be led and organized by a Group Facilitator to be selected by the Steering Committee. The Group Facilitator will have a vote for Steering Committee decisions.
3. UBOWG will hold large group meetings at least quarterly and may hold the meetings as often as monthly by approval of the full Steering Committee. UBOWG meeting times will be announced by email to all members. Individuals may join the UBOWG group email list by emailing the UBOWG Facilitator or registering at the UBOWG website.
    a. If a group member is found to be disruptive, the member will be given a warning upon approval of the Steering Committee.
    b. If the group member disruption continues, the member may be asked to discontinue participation after approval of the Steering Committee.
4. UBOWG may produce written work products with findings, recommendations, or requests only upon approval by the Steering Committee.
    a. Information and working documents may be placed into a protected work product library on the UBOWG website
        i. If the document is a product of UBOWG or a UBOWG sub-group, it may be publically posted only after full approval by the Steering Committee.
        ii. Work products placed into the work product library will not include UBOWG's name or endorsement.
    b. Individual UBOWG members may use and disseminate the information in the work product library under their own names and with their own additions or edits.

Appointment

From: Durrant, Marie [Marie.Durrant@pacificorp.com]
Sent: 8/9/2019 10:12:28 PM
To: mmckee@7county.utah.gov; aaverett@sunrise-eng.com; Adrienne.Sandoval@andeavor.com; amyc@utetribe.com; Angela.Zivkovich@anadarko.com; ashley@publiclandsolutions.org; bstringer@uintah.utah.gov; Rhammer@SLRconsulting.com; bmensinger@trinityconsultants.com; Chad.Schlichtemeier@anadarko.com; chelsea.cantrelle@epenergy.com; CColclasure@bwenergylaw.com; Dresser, Chris [Dresser.Chris@epa.gov]; Beeler, Cindy [Beeler.Cindy@epa.gov]; Smith, Claudia [Smith.Claudia@epa.gov]; Bean, Clayton [bean.clayton@epa.gov]; corey.jones@epenergy.com; Daniel.D.Pring@andeavor.com; dbrown@tricountyhealth.com; dmcneill@utah.gov; Ex. 6 Personal Privacy (PP); Douglas.Jordan@encana.com; Eoman@altamontenergy.com; eehrmantraut@SLRconsulting.com; evernon@blm.gov; gtodd@duchesne.utah.gov; huy.tran@usu.edu; jpatterson@ndnlaw.com; James.woodall@encana.com; jwoodland@crescentpointenergy.com; Jean.semborski@cop.com; joe.sager@epenergy.com; John.Spencer@simplot.com; Ex. 6 Personal Privacy (PP) jmathis@tricountyhealth.com; Karen_Pratt@xtoenergy.com; Lolsen@altamontenergy.com; Lexie Wilson [lexiewilson@utah.gov]; lonnief@utetribe.com; mbdurrant@rqn.com; mariek@utetribe.com; marc.mansfield@usu.edu; mberger@utah.gov; mstewart@redleafinc.com; Garvey, Megan [garvey.megan@epa.gov]; miken@utetribe.com; minnieg@utetribe.com; Morales, Monica [Morales.Monica@epa.gov]; Ex. 6 Personal Privacy (PP); rhrenko-browning@utahpetroleum.org; Ryan.Clerico@enefit.com; Ryan@kairosaerospace.com; Ryan.Swanson@epenergy.com; scottchew@le.utah.gov; Jackson, Scott [Jackson.Scott@epa.gov]; seth.lyman@usu.edu; svance@utah.gov; Spencer_Kimball@eogresources.com; ssiffring@westernenergyalliance.org; Thomas.H.Gibbons@andeavor.com; trang.tran@usu.edu; ttodd@utah.gov; val.oman@epenergy.com; vince.christensen@simplot.com; jmcqueen@crescentpointenergy.com; Andrea.Olsen@Simplot.com; cpennell@utah.gov; Nancy Daher [ndaher@utah.gov]; amatheson@utah.gov; wesadams@utah.gov; twiseman@utah.gov; randy.hughes@middleforkep.com; rob.zaback@middleforkep.com; Jillian.Yamartino@anadarko.com

Subject: Uinta Basin Ozone Working Group Meeting
Location: Room B101, Bingham Research Center, USU - 320 N Aggie Blvd., Vernal

Start: 8/28/2019 8:30:00 PM
End: 8/28/2019 9:30:00 PM
Show Time As: Tentative

Recurrence: (none)

We will hold the next working group meeting at the USU Bingham Research Center in room B101.

Date: August 28, 2019
Time: 2:30 – 3:30
Location: B101, Bingham Research Center, USU, 320 N. Aggie Blvd., Vernal

We hope you can attend in person but will have video available too. We tried to make the event as convenient as possible and scheduled it between the Utah Petroleum Association's event and the start of the Uinta Basin Energy Summit.

Please contact Marie Durrant (marie.durrant@pacificorp.com) if you have things you would like to put on the agenda. We will send an agenda in advance of the meeting.

Message

From: Greg Schrab [gschrab@sm-energy.com]
Sent: 7/11/2019 6:19:15 PM
To: Garvey, Megan [garvey.megan@epa.gov]
CC: Siffring, Stuart [ssiffring@westernenergyalliance.org]
Subject: RE: New Owner Self Audit Policy

Megan,

Sounds great!

Thanks,

Greg

Greg Schrab, CHMM, CSP
Corporate EH&S Manager
SM ENERGY
1775 Sherman Street
Suite 1200
Denver, CO 80203
Office: (303) 864-2567
Cell: Ex. 6 Personal Privacy (PP)
gschrab@sm-energy.com

From: Garvey, Megan <garvey.megan@epa.gov>
Sent: Thursday, July 11, 2019 12:16 PM
To: Greg Schrab <gschrab@sm-energy.com>
Cc: Siffring, Stuart <ssiffring@westernenergyalliance.org>
Subject: RE: New Owner Self Audit Policy

WARNING: This email originated from outside of SM Energy. Do not click links or open attachments unless you recognize the sender and are expecting the content and know it is safe.

Hi, Greg,

Great to see you, again, too.

Now that you highlighted the language I circulated, I can see how it looks limited to operators in the Audit Program. I spoke with Patrick Traylor this morning about this very matter and we chatted about how the opportunity to provide feedback was open to all. Let me look for additional language and talk to Patrick about how we can clarify this. I will get back to you soon.

Thanks, Megan

Megan E. Garvey
Senior Advisor for Oil and Gas, Regional Management and State Affairs
Office of the Administrator
U.S. Environmental Protection Agency
Work: 303.312.6192 | Cell: Ex. 6 Personal Privacy (PP)

From: Greg Schrab <gschrab@sm-energy.com>
Sent: Thursday, July 11, 2019 11:20 AM
To: Garvey, Megan <garvey.megan@epa.gov>
Cc: Siffring, Stuart <ssiffring@westernenergyalliance.org>
Subject: RE: New Owner Self Audit Policy

Hey Megan,

It was great to see you again the other day, thanks for meeting with our small AXPC group! Anyway, I wanted to follow up again on the possibility you raised on providing feedback on the new owner audit policy, also with Stuart and I after the WEA regulatory committee meeting you attended a couple months ago. I'm reading below again what you sent to Stuart and I back in May, and it appears it's only participating new owners that can provide feedback on equivalent approaches in the self-audit. Or is there some language somewhere else that asks for general input by industry?

Thanks,

Greg

Greg Schrab, CHMM, CSP
Corporate EH&S Manager
SM ENERGY
1775 Sherman Street
Suite 1200
Denver, CO 80203
Office: (303) 864-2567
Cell: Ex. 6 Personal Privacy (PP)
gschrab@sm-energy.com

From: Greg Schrab
Sent: Thursday, May 9, 2019 12:29 PM
To: Garvey, Megan <garvey.megan@epa.gov>
Cc: Siffring, Stuart <ssiffring@westernenergyalliance.org>
Subject: RE:

Thanks Megan, and great to see you too!

Thanks,

Greg

Greg Schrab, CHMM, CSP
Corporate EH&S Manager
SM ENERGY
1775 Sherman Street
Suite 1200
Denver, CO 80203
Office: (303) 864-2567
Cell: Ex. 6 Personal Privacy (PP)
gschrab@sm-energy.com

From: Garvey, Megan <garvey.megan@epa.gov>
Sent: Thursday, May 9, 2019 12:23 PM
To: Greg Schrab <gschrab@sm-energy.com>
Cc: Siffring, Stuart <ssiffring@westernenergyalliance.org>
Subject: RE:

WARNING: This email originated from outside of SM Energy. Do not click links or open attachments unless you recognize the sender and are expecting the content and know it is safe.

Thanks, Greg.

Stuart and Greg:

The invitation for feedback on the New Owner Audit Program is on page 6 of the Implementation Considerations document (also referred to as the Oil and Gas New Owner Program Questions and Answers):

https://www.epa.gov/sites/production/files/2019-03/documents/ognewownerprogramquestionsandanswers032919.pdf

The EPA is Providing Participating New Owners with Additional Operational Flexibility for Completing Appendix B

For up to one year following the Agreement's effective date, a New Owner may propose equivalent engineering, design, and/or operational measures in lieu of those specified in Appendix B. The proposed measures shall demonstrate that:

1. vapor control system pressures will not exceed the applicable leak points during normal operations;
2. vapor control systems achieve stated control efficiencies during normal operations; and
3. compromised equipment is detected and repaired or replaced.

Thanks and nice to see you both! Megan

Megan E. Garvey
Senior Advisor for Oil and Gas, Regional Management and State Affairs
Office of the Administrator
U.S. Environmental Protection Agency
Work: 303.312.6192 | Cell: Ex. 6 Personal Privacy (PP)

Message

From: Lawrence, Rob [Lawrence.Rob@epa.gov]
Sent: 7/9/2019 7:27:25 PM
To: jpeiserich@perkinstrotter.com; don@paschallstrategic.com; tricia@paschallstrategic.com; bill@paschallstrategic.com; sdonovan@anteroresources.com; jdeister@calfrac.com; byron.gale@encana.com; jcooper@geosyntec.com; kate.fay@nblenergy.com; ksgamma@westernenergyalliance.org; emmerta@api.org; feldman@api.org; meadows@api.org; ToddM@api.org; al_collins@oxy.com; Hilary_moffett@oxy.com; Ex. 6 Personal Privacy (PP) sharon.crain@chk.com; gblack@chevron.com; jeff.copeskey@exxonmobil.com; nathan.mcbride@lmoga.com; cece@loga.la; James Durbin [james.durbin@c-ka.com]; Ex. 6 Personal Privacy (PP) bhochheiser@all-llc.com; marbob@marbob.com; MarieG@nmoga.org; matthias.sayer@nglep.com; seligman@energyadvocate.us; brandon.wilburn@chaparralenergy.com; kyle.arthur@chk.com; daphne.gilbert@chk.com; rick.mccurdy@chk.com; brian.woodard2@chk.com; roger.kelley@clr.com; angie.burckhalter@dvn.com; jason.clark@dvn.com; darren.smith@dvn.com; paul.doucette@ge.com; taylor.shinn@ge.com; lori.wrotenbery@iogcc.state.ok.us; karen.flock@magellanlp.com; john.watson@newdominion.net; mterry@oipa.com; david.yard@srp-ok.com; Ex. 6 Personal Privacy (PP) julie.betik@anadarko.com; jd.holt@anadarko.com; david.mcbride@anadarko.com; jag@arubapetroleum.com; eireland@bseec.org; jmorris@beusaenergy.com; ray.nojek@bhpbilliton.com; paula.barnett@bp.com; dana.wood@bp.com; jay.eubanks@bp.com; rjsa@chevron.com; rkaschmitter@comstockresources.com; greg.schnacke@denbury.com; hickman@hickmansales.com; jraley@dmlp.net; beth.atwood@elpaso.com; elizabeth.claude@enbridge.com; clint.cowan@energytransfer.com; sfigueroa@excoresources.com; gfox@gfoxconsulting.com; luke@gfoxconsulting.com; dcoughlin@hess.com; jfurnance@hilcorp.com; gjahn@harcresearch.org; lydiaGromatzky@huntonak.com; michelle_mora-gonzales@kindermorgan.com; jalbert@mspartners.com; lschoeling@neotekenergy.com; wendy.kirchoff@nblenergy.com; michael_duplantis@oxy.com; julie_moore@oxy.com; ed.hance@pxd.com; tadd.owens@pxd.com; rhaut@rpsea.org; matthew.lahvis@shell.com; martin.medina@shell.com; haley.curry@steer.com; dan_croll@swn.com; carla_shugart@swn.com; clay_murral@swn.com; jennifer_stewart@swn.com; Ex. 6 Personal Privacy (PP) gleallaw@sbcglobal.net; alexm@texasalliance.org; johnt@texasalliance.org; elonganecker@tipro.org; lskinner@tipro.org; mruckel@txoga.org; thure.cannon@texaspipelines.com; texaspipelineassociation@yahoo.com; charles.yarbrough@atmosenergy.com; jimmie.hammontree@williams.com; bill@windriverassociatesllc.com; lindsey_dingmore@xtoenergy.com; bill_duncan@xtoenergy.com
CC: Garvey, Megan [garvey.megan@epa.gov]; Beeler, Cindy [Beeler.Cindy@epa.gov]; Vyas, Himanshu [vyas.himanshu@epa.gov]; Topinka, Natalie [topinka.natalie@epa.gov]; Mia, Marcia [Mia.Marcia@epa.gov]
Subject: FW: Register for EPA's Natural Gas STAR Data-Driven Decision Making Webinar - July 24

Rob Lawrence
Region 6
Policy Advisor - Energy Issues
214.665.6580

From: EPA Natural Gas STAR Program <gasstar@tetratech.com>
Sent: Tuesday, July 09, 2019 1:31 PM
To: Lawrence, Rob <Lawrence.Rob@epa.gov>
Subject: Register for EPA's Natural Gas STAR Data-Driven Decision Making Webinar

View this email in your browser

EPA's Natural Gas STAR and Methane Challenge Programs invite you to a Data-Driven Decision Making Webinar on **Wednesday, July 24, 2019** from **1:00PM to 2:30PM Eastern**. Natural Gas STAR and Methane Challenge Partner Kinder Morgan will discuss the following topics:

- Tracking, managing, and analyzing data to reduce methane emissions
- Best practices for data management
- Kinder Morgan's experience participating in the Methane Challenge Program in the ONE Future Commitment Option

You can join the webinar from anywhere with an internet connection and a web browser. Participation in the webinar is free, but online registration is required.

Message

From: Marie Bradshaw Durrant [MBDurrant@rqn.com]
Sent: 6/12/2019 5:58:19 PM
To: 'Daniel.D.Pring@andeavor.com' [Daniel.D.Pring@andeavor.com]; Beeler, Cindy [Beeler.Cindy@epa.gov]; 'cpennell@utah.gov' [cpennell@utah.gov]; 'trang.tran@usu.edu' [trang.tran@usu.edu]; 'Ryan@kairosaerospace.com' [Ryan@kairosaerospace.com]; 'mstewart@redleafinc.com' [mstewart@redleafinc.com]; 'jwoodland@crescentpointenergy.com' [jwoodland@crescentpointenergy.com]; 'Ryan.Clerico@enefit.com' [Ryan.Clerico@enefit.com]; **Ex. 6 Personal Privacy (PP)**; 'eehrmantraut@SLRconsulting.com' [eehrmantraut@SLRconsulting.com]; 'huy.tran@usu.edu' [huy.tran@usu.edu]; 'Jhirschi@enervest.net' [Jhirschi@enervest.net]; Bean, Clayton [bean.clayton@epa.gov]; 'jmathis@tricountyhealth.com' [jmathis@tricountyhealth.com]; 'joe.sager@epenergy.com' [joe.sager@epenergy.com]; 'debbie@breatheutah.org' [debbie@breatheutah.org]; 'Yamartino, Jillian' [Jillian.Yamartino@anadarko.com]; 'vince.christensen@simplot.com' [vince.christensen@simplot.com]; 'Spencer_Kimball@eogresources.com' [Spencer_Kimball@eogresources.com]; 'corey.jones@epenergy.com' [corey.jones@epenergy.com]; 'gtodd@duchesne.utah.gov' [gtodd@duchesne.utah.gov]; 'Rhammer@SLRconsulting.com' [Rhammer@SLRconsulting.com]; 'Douglas.Jordan@encana.com' [Douglas.Jordan@encana.com]; 'lonnief@utetribe.com' [lonnief@utetribe.com]; 'amyc@utetribe.com' [amyc@utetribe.com]; Jackson, Scott [Jackson.Scott@epa.gov]; 'Lolsen@altamontenergy.com' [Lolsen@altamontenergy.com]; 'scottchew@le.utah.gov' [scottchew@le.utah.gov]; 'aaverett@sunrise-eng.com' [aaverett@sunrise-eng.com]; mberger@utah.gov; 'dbrown@tricountyhealth.com' [dbrown@tricountyhealth.com]; 'jmcqueen@crescentpointenergy.com' [jmcqueen@crescentpointenergy.com]; 'Ryan.Swanson@epenergy.com' [Ryan.Swanson@epenergy.com]; 'marc.mansfield@usu.edu' [marc.mansfield@usu.edu]; 'Eoman@altamontenergy.com' [Eoman@altamontenergy.com]; 'rob.zaback@middleforkep.com' [rob.zaback@middleforkep.com]; 'svance@utah.gov' [svance@utah.gov]; 'Jean.semborski@cop.com' [Jean.semborski@cop.com]; Morales, Monica [Morales.Monica@epa.gov]; Smith, Claudia [Smith.Claudia@epa.gov]; 'mariek@utetribe.com' [mariek@utetribe.com]; Garvey, Megan [garvey.megan@epa.gov]; 'rhrenko-browning@utahpetroleum.org' [rhrenko-browning@utahpetroleum.org]; 'ssiffring@westernenergyalliance.org' [ssiffring@westernenergyalliance.org]; 'jpatterson@ndnlaw.com' [jpatterson@ndnlaw.com]; 'wesadams@utah.gov' [wesadams@utah.gov]; 'rpage@ie-cos.com' [rpage@ie-cos.com]; 'Adrienne.Sandoval@andeavor.com' [Adrienne.Sandoval@andeavor.com]; 'dmcneill@utah.gov' [dmcneill@utah.gov]; 'evernon@blm.gov' [evernon@blm.gov]; Nancy Daher [ndaher@utah.gov]; 'amatheson@utah.gov' [amatheson@utah.gov]; 'John.Spencer@simplot.com' [John.Spencer@simplot.com]; 'randy.hughes@middleforkep.com' [randy.hughes@middleforkep.com]; 'CColclasure@bwenergylaw.com' [CColclasure@bwenergylaw.com]; 'val.oman@epenergy.com' [val.oman@epenergy.com]; 'Chad.Schlichtemeier@anadarko.com' [Chad.Schlichtemeier@anadarko.com]; 'ttodd@utah.gov' [ttodd@utah.gov]; 'chelsea.cantrelle@epenergy.com' [chelsea.cantrelle@epenergy.com]; Dresser, Chris [Dresser.Chris@epa.gov]; 'Andrea.Olsen@Simplot.com' [Andrea.Olsen@Simplot.com]; 'twiseman@utah.gov' [twiseman@utah.gov]; miken@utetribe.com; 'bmensinger@trinityconsultants.com' [bmensinger@trinityconsultants.com]; 'bstringer@uintah.utah.gov' [bstringer@uintah.utah.gov]; 'ashley@publiclandsolutions.org' [ashley@publiclandsolutions.org]; Lexie Wilson [lexiewilson@utah.gov]; minnieg@utetribe.com; 'Karen_Pratt@xtoenergy.com' [Karen_Pratt@xtoenergy.com]; 'seth.lyman@usu.edu' [seth.lyman@usu.edu]; 'Angela.Zivkovich@anadarko.com' [Angela.Zivkovich@anadarko.com]; 'Thomas.H.Gibbons@andeavor.com' [Thomas.H.Gibbons@andeavor.com]; 'James.woodall@encana.com' [James.woodall@encana.com]; 'kburdick@Duchesne.utah.gov' [kburdick@Duchesne.utah.gov]
CC: 'Shea, Jennifer' [Jennifer.Shea@anadarko.com]
Subject: Uinta Basin Ozone Working Group Meeting

Hi All,

Below is video and call-in information for today's meeting.

Marie

RQN is inviting you to a scheduled Zoom meeting.

Topic: Uinta Basin Ozone Working Group June 2019 Meeting
Time: Jun 12, 2019 2:00 PM Mountain Time (US and Canada)

Join Zoom Meeting

Ex. 6 Personal Privacy (PP)

Marie Bradshaw Durrant | Ray Quinney & Nebeker P.C. | 36 South State Street, Suite 1400 | Salt Lake City, Utah 84111
Direct: 801-323-3379 | Mobile: Ex. 6 Personal Privacy (PP) | Facsimile: 801-532-7543 | www.rqn.com

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Message

From: Marie Bradshaw Durrant [MBDurrant@rqn.com]
Sent: 6/6/2019 4:09:18 PM
To: Nancy Daher [ndaher@utah.gov]; Garvey, Megan [garvey.megan@epa.gov]; 'Jhirschi@enervest.net' [Jhirschi@enervest.net]; 'bmensinger@trinityconsultants.com' [bmensinger@trinityconsultants.com]; 'eehrmantraut@SLRconsulting.com' [eehrmantraut@SLRconsulting.com]; 'chelsea.cantrelle@epenergy.com' [chelsea.cantrelle@epenergy.com]; 'Eoman@altamontenergy.com' [Eoman@altamontenergy.com]; 'Yamartino, Jillian' [Jillian.Yamartino@anadarko.com]; 'James.woodall@encana.com' [James.woodall@encana.com]; 'wesadams@utah.gov' [wesadams@utah.gov]; 'Daniel.D.Pring@andeavor.com' [Daniel.D.Pring@andeavor.com]; 'Douglas.Jordan@encana.com' [Douglas.Jordan@encana.com]; Morales, Monica [Morales.Monica@epa.gov]; 'amyc@utetribe.com' [amyc@utetribe.com]; 'kburdick@Duchesne.utah.gov' [kburdick@Duchesne.utah.gov]; 'jwoodland@crescentpointenergy.com' [jwoodland@crescentpointenergy.com]; 'debbie@breatheutah.org' [debbie@breatheutah.org]; 'Lolsen@altamontenergy.com' [Lolsen@altamontenergy.com]; Jackson, Scott [Jackson.Scott@epa.gov]; 'Thomas.H.Gibbons@andeavor.com' [Thomas.H.Gibbons@andeavor.com]; 'Ryan@kairosaerospace.com' [Ryan@kairosaerospace.com]; 'aaverett@sunrise-eng.com' [aaverett@sunrise-eng.com]; Beeler, Cindy [Beeler.Cindy@epa.gov]; 'corey.jones@epenergy.com' [corey.jones@epenergy.com]; 'scottchew@le.utah.gov' [scottchew@le.utah.gov]; 'huy.tran@usu.edu' [huy.tran@usu.edu]; 'Jean.semborski@cop.com' [Jean.semborski@cop.com]; 'ashley@publiclandsolutions.org' [ashley@publiclandsolutions.org]; 'Ryan.Clerico@enefit.com' [Ryan.Clerico@enefit.com]; Dresser, Chris [Dresser.Chris@epa.gov]; 'CColclasure@bwenergylaw.com' [CColclasure@bwenergylaw.com]; 'cpennell@utah.gov' [cpennell@utah.gov]; minnieg@utetribe.com; 'Rhammer@SLRconsulting.com' [Rhammer@SLRconsulting.com]; 'dbrown@tricountyhealth.com' [dbrown@tricountyhealth.com]; 'trang.tran@usu.edu' [trang.tran@usu.edu]; 'jmcqueen@crescentpointenergy.com' [jmcqueen@crescentpointenergy.com]; 'Angela.Zivkovich@anadarko.com' [Angela.Zivkovich@anadarko.com]; 'jmathis@tricountyhealth.com' [jmathis@tricountyhealth.com]; 'gtodd@duchesne.utah.gov' [gtodd@duchesne.utah.gov]; 'Adrienne.Sandoval@andeavor.com' [Adrienne.Sandoval@andeavor.com]; 'joe.sager@epenergy.com' [joe.sager@epenergy.com]; 'Karen_Pratt@xtoenergy.com' [Karen_Pratt@xtoenergy.com]; 'mstewart@redleafinc.com' [mstewart@redleafinc.com]; 'vince.christensen@simplot.com' [vince.christensen@simplot.com]; 'ttodd@utah.gov' [ttodd@utah.gov]; 'jpatterson@ndnlaw.com' [jpatterson@ndnlaw.com]; 'mariek@utetribe.com' [mariek@utetribe.com]; 'marc.mansfield@usu.edu' [marc.mansfield@usu.edu]; 'twiseman@utah.gov' [twiseman@utah.gov]; miken@utetribe.com; Bean, Clayton [bean.clayton@epa.gov]; 'bstringer@uintah.utah.gov' [bstringer@uintah.utah.gov]; Smith, Claudia [Smith.Claudia@epa.gov]; 'lonnief@utetribe.com' [lonnief@utetribe.com]; 'rpage@ie-cos.com' [rpage@ie-cos.com]; 'amatheson@utah.gov' [amatheson@utah.gov]; 'Chad.Schlichtemeier@anadarko.com' [Chad.Schlichtemeier@anadarko.com]; 'svance@utah.gov' [svance@utah.gov]; Lexie Wilson [lexiewilson@utah.gov]; 'Andrea.Olsen@Simplot.com' [Andrea.Olsen@Simplot.com]; 'rhrenko-browning@utahpetroleum.org' [rhrenko-browning@utahpetroleum.org]; 'rob.zaback@middleforkep.com' [rob.zaback@middleforkep.com]; Ex. 6 Personal Privacy (PP) Ex. 6 Personal Privacy (PP); 'ssiffring@westernenergyalliance.org' [ssiffring@westernenergyalliance.org]; 'Ryan.Swanson@epenergy.com' [Ryan.Swanson@epenergy.com]; 'randy.hughes@middleforkep.com' [randy.hughes@middleforkep.com]; 'seth.lyman@usu.edu' [seth.lyman@usu.edu]; 'John.Spencer@simplot.com' [John.Spencer@simplot.com]; 'evernon@blm.gov' [evernon@blm.gov]; 'val.oman@epenergy.com' [val.oman@epenergy.com]; 'Spencer_Kimball@eogresources.com' [Spencer_Kimball@eogresources.com]; mberger@utah.gov; 'dmcneill@utah.gov' [dmcneill@utah.gov]
CC: 'Shea, Jennifer' [Jennifer.Shea@anadarko.com]; Doris Vanden Akker [dvandenakker@RQN.COM]
Subject: RE: Uinta Basin Ozone Working Group Meeting

Apologies – the meeting is **WEDNESDAY**, June 12 from 2:00 – 3:00 pm.

Marie

Marie Bradshaw Durrant | Ray Quinney & Nebeker P.C. | 36 South State Street, Suite 1400 | Salt Lake City, Utah 84111
Direct: 801-323-3379 | Mobile: Ex. 6 Personal Privacy (PP) | Facsimile: 801-532-7543 | www.rqn.com

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From: Marie Bradshaw Durrant
Sent: Thursday, June 06, 2019 10:05 AM
To: 'ndaher@utah.gov'; 'garvey.megan@epa.gov'; 'Jhirschi@enervest.net'; 'bmensinger@trinityconsultants.com'; 'eehrmantraut@SLRconsulting.com'; 'chelsea.cantrelle@epenergy.com'; 'Eoman@altamontenergy.com'; 'Yamartino, Jillian'; 'James.woodall@encana.com'; 'wesadams@utah.gov'; 'Daniel.D.Pring@andeavor.com'; 'Douglas.Jordan@encana.com'; 'morales.monica@epa.gov'; 'amyc@utetribe.com'; 'kburdick@Duchesne.utah.gov'; 'jwoodland@crescentpointenergy.com'; 'debbie@breatheutah.org'; 'Lolsen@altamontenergy.com'; 'jackson.scott@epa.gov'; 'Thomas.H.Gibbons@andeavor.com'; 'Ryan@kairosaerospace.com'; 'aaverett@sunrise-eng.com'; 'Beeler.Cindy@epa.gov'; 'corey.jones@epenergy.com'; 'scottchew@le.utah.gov'; 'huy.tran@usu.edu'; 'Jean.semborski@cop.com'; 'ashley@publiclandsolutions.org'; 'Ryan.Clerico@enefit.com'; 'Dresser.Chris@epa.gov'; 'CColclasure@bwenergylaw.com'; 'cpennell@utah.gov'; 'minnieg@utetribe.com'; 'Rhammer@SLRconsulting.com'; 'dbrown@tricountyhealth.com'; 'trang.tran@usu.edu'; 'jmcqueen@crescentpointenergy.com'; 'Angela.Zivkovich@anadarko.com'; 'jmathis@tricountyhealth.com'; 'gtodd@duchesne.utah.gov'; 'Adrienne.Sandoval@andeavor.com'; 'joe.sager@epenergy.com'; 'Karen_Pratt@xtoenergy.com'; 'mstewart@redleafinc.com'; 'vince.christensen@simplot.com'; 'ttodd@utah.gov'; 'jpatterson@ndnlaw.com'; 'mariek@utetribe.com'; 'marc.mansfield@usu.edu'; 'twiseman@utah.gov'; 'miken@utetribe.com'; 'bean.clayton@epa.gov'; 'bstringer@uintah.utah.gov'; 'smith.claudia@epa.gov'; 'lonnief@utetribe.com'; 'rpage@ie-cos.com'; 'amatheson@utah.gov'; 'Chad.Schlichtemeier@anadarko.com'; 'svance@utah.gov'; 'lexiewilson@utah.gov'; 'Andrea.Olsen@Simplot.com'; 'rhrenko-browning@utahpetroleum.org'; 'rob.zaback@middleforkep.com'; Ex. 6 Personal Privacy (PP); 'ssiffring@westernenergyalliance.org'; 'Ryan.Swanson@epenergy.com'; 'randy.hughes@middleforkep.com'; 'seth.lyman@usu.edu'; 'John.Spencer@simplot.com'; 'evernon@blm.gov'; 'val.oman@epenergy.com'; 'Spencer_Kimball@eogresources.com'; 'mberger@utah.gov'; 'dmcneill@utah.gov'
Cc: 'Shea, Jennifer'; Doris Vanden Akker
Subject: RE: Uinta Basin Ozone Working Group Meeting

Hi All,

Please find the proposed agenda attached for Tuesday's meeting (June 12, 2019, 2:00 – 3:00). We will send out video conferencing information soon.

Also as a general reminder, attached is the Group mission/purpose/procedures document. We will briefly review these at the beginning of the meeting. << File: 2019 0612 Uinta Basin Ozone Working Group Meeting Agenda.docx >> << File: Ozone_-_UBOWG_Mission_Objectives_and_Procedures.DOCX >>

If you have any additions/topics you would like to add to the agenda, please contact me.

Marie

Marie Bradshaw Durrant | Ray Quinney & Nebeker P.C. | 36 South State Street, Suite 1400 | Salt Lake City, Utah 84111
Direct: 801-323-3379 | Mobile: Ex. 6 Personal Privacy (PP) | Facsimile: 801-532-7543 | www.rqn.com

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-----Original Appointment-----
From: Marie Bradshaw Durrant
Sent: Wednesday, May 15, 2019 5:31 PM
To: Marie Bradshaw Durrant; 'ndaher@utah.gov'; 'garvey.megan@epa.gov'; 'Jhirschi@enervest.net'; 'bmensinger@trinityconsultants.com'; 'eehrmantraut@SLRconsulting.com'; 'chelsea.cantrelle@epenergy.com'; 'Eoman@altamontenergy.com'; 'Yamartino, Jillian'; 'James.woodall@encana.com'; 'wesadams@utah.gov'; 'Daniel.D.Pring@andeavor.com'; 'Douglas.Jordan@encana.com'; 'morales.monica@epa.gov'; 'amyc@utetribe.com';

'kburdick@Duchesne.utah.gov'; 'jwoodland@crescentpointenergy.com'; 'debbie@breatheutah.org'; 'Lolsen@altamontenergy.com'; 'jackson.scott@epa.gov'; 'Thomas.H.Gibbons@andeavor.com'; 'Ryan@kairosaerospace.com'; 'aaverett@sunrise-eng.com'; 'Beeler.Cindy@epa.gov'; 'corey.jones@epenergy.com'; 'scottchew@le.utah.gov'; 'huy.tran@usu.edu'; 'Jean.semborski@cop.com'; 'ashley@publiclandsolutions.org'; 'Ryan.Clerico@enefit.com'; 'Dresser.Chris@epa.gov'; 'CColclasure@bwenergylaw.com'; 'cpennell@utah.gov'; 'minnieg@utetribe.com'; 'Rhammer@SLRconsulting.com'; 'dbrown@tricountyhealth.com'; 'trang.tran@usu.edu'; 'jmcqueen@crescentpointenergy.com'; 'Angela.Zivkovich@anadarko.com'; 'jmathis@tricountyhealth.com'; 'gtodd@duchesne.utah.gov'; 'Adrienne.Sandoval@andeavor.com'; 'joe.sager@epenergy.com'; 'Karen_Pratt@xtoenergy.com'; 'mstewart@redleafinc.com'; 'vince.christensen@simplot.com'; 'ttodd@utah.gov'; 'jpatterson@ndnlaw.com'; 'mariek@utetribe.com'; 'marc.mansfield@usu.edu'; 'twiseman@utah.gov'; 'miken@utetribe.com'; 'bean.clayton@epa.gov'; 'bstringer@uintah.utah.gov'; 'smith.claudia@epa.gov'; 'lonnief@utetribe.com'; 'rpage@ie-cos.com'; 'amatheson@utah.gov'; 'Chad.Schlichtemeier@anadarko.com'; 'svance@utah.gov'; 'lexiewilson@utah.gov'; 'Andrea.Olsen@Simplot.com'; 'rhrenko-browning@utahpetroleum.org'; 'rob.zaback@middleforkep.com'; Ex. 6 Personal Privacy (PP); 'ssiffring@westernenergyalliance.org'; 'Ryan.Swanson@epenergy.com'; 'randy.hughes@middleforkep.com'; 'seth.lyman@usu.edu'; 'John.Spencer@simplot.com'; 'evernon@blm.gov'; 'val.oman@epenergy.com'; 'Spencer_Kimball@eogresources.com'; 'mberger@utah.gov'; 'dmcneill@utah.gov'
Cc: Shea, Jennifer
Subject: Uinta Basin Ozone Working Group Meeting
When: Wednesday, June 12, 2019 2:00 PM-3:00 PM (UTC-07:00) Mountain Time (US & Canada).
Where: Vernal, Salt Lake City, Denver

Message

From: Marie Bradshaw Durrant [MBDurrant@rqn.com]
Sent: 6/6/2019 4:04:53 PM
To: Nancy Daher [ndaher@utah.gov]; Garvey, Megan [garvey.megan@epa.gov]; 'Jhirschi@enervest.net' [Jhirschi@enervest.net]; 'bmensinger@trinityconsultants.com' [bmensinger@trinityconsultants.com]; 'eehrmantraut@SLRconsulting.com' [eehrmantraut@SLRconsulting.com]; 'chelsea.cantrelle@epenergy.com' [chelsea.cantrelle@epenergy.com]; 'Eoman@altamontenergy.com' [Eoman@altamontenergy.com]; 'Yamartino, Jillian' [Jillian.Yamartino@anadarko.com]; 'James.woodall@encana.com' [James.woodall@encana.com]; 'wesadams@utah.gov' [wesadams@utah.gov]; 'Daniel.D.Pring@andeavor.com' [Daniel.D.Pring@andeavor.com]; 'Douglas.Jordan@encana.com' [Douglas.Jordan@encana.com]; Morales, Monica [Morales.Monica@epa.gov]; 'amyc@utetribe.com' [amyc@utetribe.com]; 'kburdick@Duchesne.utah.gov' [kburdick@Duchesne.utah.gov]; 'jwoodland@crescentpointenergy.com' [jwoodland@crescentpointenergy.com]; 'debbie@breatheutah.org' [debbie@breatheutah.org]; 'Lolsen@altamontenergy.com' [Lolsen@altamontenergy.com]; Jackson, Scott [Jackson.Scott@epa.gov]; 'Thomas.H.Gibbons@andeavor.com' [Thomas.H.Gibbons@andeavor.com]; 'Ryan@kairosaerospace.com' [Ryan@kairosaerospace.com]; 'aaverett@sunrise-eng.com' [aaverett@sunrise-eng.com]; Beeler, Cindy [Beeler.Cindy@epa.gov]; 'corey.jones@epenergy.com' [corey.jones@epenergy.com]; 'scottchew@le.utah.gov' [scottchew@le.utah.gov]; 'huy.tran@usu.edu' [huy.tran@usu.edu]; 'Jean.semborski@cop.com' [Jean.semborski@cop.com]; 'ashley@publiclandsolutions.org' [ashley@publiclandsolutions.org]; 'Ryan.Clerico@enefit.com' [Ryan.Clerico@enefit.com]; Dresser, Chris [Dresser.Chris@epa.gov]; 'CColclasure@bwenergylaw.com' [CColclasure@bwenergylaw.com]; 'cpennell@utah.gov' [cpennell@utah.gov]; minnieg@utetribe.com; 'Rhammer@SLRconsulting.com' [Rhammer@SLRconsulting.com]; 'dbrown@tricountyhealth.com' [dbrown@tricountyhealth.com]; 'trang.tran@usu.edu' [trang.tran@usu.edu]; 'jmcqueen@crescentpointenergy.com' [jmcqueen@crescentpointenergy.com]; 'Angela.Zivkovich@anadarko.com' [Angela.Zivkovich@anadarko.com]; 'jmathis@tricountyhealth.com' [jmathis@tricountyhealth.com]; 'gtodd@duchesne.utah.gov' [gtodd@duchesne.utah.gov]; 'Adrienne.Sandoval@andeavor.com' [Adrienne.Sandoval@andeavor.com]; 'joe.sager@epenergy.com' [joe.sager@epenergy.com]; 'Karen_Pratt@xtoenergy.com' [Karen_Pratt@xtoenergy.com]; 'mstewart@redleafinc.com' [mstewart@redleafinc.com]; 'vince.christensen@simplot.com' [vince.christensen@simplot.com]; 'ttodd@utah.gov' [ttodd@utah.gov]; 'jpatterson@ndnlaw.com' [jpatterson@ndnlaw.com]; 'mariek@utetribe.com' [mariek@utetribe.com]; 'marc.mansfield@usu.edu' [marc.mansfield@usu.edu]; 'twiseman@utah.gov' [twiseman@utah.gov]; miken@utetribe.com; Bean, Clayton [bean.clayton@epa.gov]; 'bstringer@uintah.utah.gov' [bstringer@uintah.utah.gov]; Smith, Claudia [Smith.Claudia@epa.gov]; 'lonnief@utetribe.com' [lonnief@utetribe.com]; 'rpage@ie-cos.com' [rpage@ie-cos.com]; 'amatheson@utah.gov' [amatheson@utah.gov]; 'Chad.Schlichtemeier@anadarko.com' [Chad.Schlichtemeier@anadarko.com]; 'svance@utah.gov' [svance@utah.gov]; Lexie Wilson [lexiewilson@utah.gov]; 'Andrea.Olsen@Simplot.com' [Andrea.Olsen@Simplot.com]; 'rhrenko-browning@utahpetroleum.org' [rhrenko-browning@utahpetroleum.org]; 'rob.zaback@middleforkep.com' [rob.zaback@middleforkep.com]; Ex. 6 Personal Privacy (PP) Ex. 6 Personal Privacy (PP)]; 'ssiffring@westernenergyalliance.org' [ssiffring@westernenergyalliance.org]; 'Ryan.Swanson@epenergy.com' [Ryan.Swanson@epenergy.com]; 'randy.hughes@middleforkep.com' [randy.hughes@middleforkep.com]; 'seth.lyman@usu.edu' [seth.lyman@usu.edu]; 'John.Spencer@simplot.com' [John.Spencer@simplot.com]; 'evernon@blm.gov' [evernon@blm.gov]; 'val.oman@epenergy.com' [val.oman@epenergy.com]; 'Spencer_Kimball@eogresources.com' [Spencer_Kimball@eogresources.com]; mberger@utah.gov; 'dmcneill@utah.gov' [dmcneill@utah.gov]
CC: 'Shea, Jennifer' [Jennifer.Shea@anadarko.com]; Doris Vanden Akker [dvandenakker@RQN.COM]
Subject: RE: Uinta Basin Ozone Working Group Meeting
Attachments: 2019 0612 Uinta Basin Ozone Working Group Meeting Agenda.docx; Ozone_-_UBOWG_Mission_Objectives_and_Procedures.DOCX

Hi All,

Please find the proposed agenda attached for Tuesday's meeting (June 12, 2019, 2:00 – 3:00). We will send out video conferencing information soon.

Also as a general reminder, attached is the Group mission/purpose/procedures document. We will briefly review these at the beginning of the meeting.

If you have any additions/topics you would like to add to the agenda, please contact me.

Marie

Marie Bradshaw Durrant | Ray Quinney & Nebeker P.C. | 36 South State Street, Suite 1400 | Salt Lake City, Utah 84111
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-----Original Appointment-----
From: Marie Bradshaw Durrant
Sent: Wednesday, May 15, 2019 5:31 PM
To: Marie Bradshaw Durrant; 'ndaher@utah.gov'; 'garvey.megan@epa.gov'; 'Jhirschi@enervest.net'; 'bmensinger@trinityconsultants.com'; 'eehrmantraut@SLRconsulting.com'; 'chelsea.cantrelle@epenergy.com'; 'Eoman@altamontenergy.com'; 'Yamartino, Jillian'; 'James.woodall@encana.com'; 'wesadams@utah.gov'; 'Daniel.D.Pring@andeavor.com'; 'Douglas.Jordan@encana.com'; 'morales.monica@epa.gov'; 'amyc@utetribe.com'; 'kburdick@Duchesne.utah.gov'; 'jwoodland@crescentpointenergy.com'; 'debbie@breatheutah.org'; 'Lolsen@altamontenergy.com'; 'jackson.scott@epa.gov'; 'Thomas.H.Gibbons@andeavor.com'; 'Ryan@kairosaerospace.com'; 'aaverett@sunrise-eng.com'; 'Beeler.Cindy@epa.gov'; 'corey.jones@epenergy.com'; 'scottchew@le.utah.gov'; 'huy.tran@usu.edu'; 'Jean.semborski@cop.com'; 'ashley@publiclandsolutions.org'; 'Ryan.Clerico@enefit.com'; 'Dresser.Chris@epa.gov'; 'CColclasure@bwenergylaw.com'; 'cpennell@utah.gov'; 'minnieg@utetribe.com'; 'Rhammer@SLRconsulting.com'; 'dbrown@tricountyhealth.com'; 'trang.tran@usu.edu'; 'jmcqueen@crescentpointenergy.com'; 'Angela.Zivkovich@anadarko.com'; 'jmathis@tricountyhealth.com'; 'gtodd@duchesne.utah.gov'; 'Adrienne.Sandoval@andeavor.com'; 'joe.sager@epenergy.com'; 'Karen_Pratt@xtoenergy.com'; 'mstewart@redleafinc.com'; 'vince.christensen@simplot.com'; 'ttodd@utah.gov'; 'jpatterson@ndnlaw.com'; 'mariek@utetribe.com'; 'marc.mansfield@usu.edu'; 'twiseman@utah.gov'; 'miken@utetribe.com'; 'bean.clayton@epa.gov'; 'bstringer@uintah.utah.gov'; 'smith.claudia@epa.gov'; 'lonnief@utetribe.com'; 'rpage@ie-cos.com'; 'amatheson@utah.gov'; 'Chad.Schlichtemeier@anadarko.com'; 'svance@utah.gov'; 'lexiewilson@utah.gov'; 'Andrea.Olsen@Simplot.com'; 'rhrenko-browning@utahpetroleum.org'; 'rob.zaback@middleforkep.com'; Ex. 6 Personal Privacy (PP); 'ssiffring@westernenergyalliance.org'; 'Ryan.Swanson@epenergy.com'; 'randy.hughes@middleforkep.com'; 'seth.lyman@usu.edu'; 'John.Spencer@simplot.com'; 'evernon@blm.gov'; 'val.oman@epenergy.com'; 'Spencer_Kimball@eogresources.com'; 'mberger@utah.gov'; 'dmcneill@utah.gov'
Cc: Shea, Jennifer
Subject: Uinta Basin Ozone Working Group Meeting
When: Wednesday, June 12, 2019 2:00 PM-3:00 PM (UTC-07:00) Mountain Time (US & Canada).
Where: Vernal, Salt Lake City, Denver

Uinta Basin Ozone Working Group Meeting
June 12, 2019

1. Review of Group mission/purpose
2. Ozone Events – how to update/improve checklist/reporting/recognition
    a. Seasonal actions vs. general improvements
    b. Work with companies to give them the time and information they need to get necessary internal approvals for reporting
3. Overview of new EPA FIP, proposed rulemaking for emission reduction credit bank, Uinta Basin FIP
    a. EPA update
    b. Industry perspective – Stuart Siffring, Western Energy Alliance
    c. Other perspectives
4. August 5 UDAQ Board Meeting - 5-year review of DAQ O&G rules (R307-501-504) – opportunity to provide positive input?
5. EPA update on air quality planning – nonattainment level bump
6. Other topics?
7. For next meeting: BLM general conformity grace period coming to an end; impact on resource management planning if nonattainment level is increased

UINTA BASIN OZONE WORKING GROUP ("UBOWG") MISSION, OBJECTIVES, AND PROCEDURES

1. Mission Statement:

Proposed New Mission Statement: The Uinta Basin Ozone Working Group is a collaborative forum to facilitate attainment of the ozone standard in the Uinta Basin. The Group includes representation from non-federal government decision-makers in the Uinta Basin, regulators, stakeholders, and experts. Federal regulators participate in group meetings but not group decision-making. We aim to find and support solutions through increased understanding of high ozone incidents in the Basin, improved communication, and exploration of known and novel responses.

2. Short-term and long-term objectives

Background Note: UBOWG recognizes that it does not have authority to make or demand policy or regulations governing sources in the Uinta Basin.

Short Term:

1. Assemble information and analyses to better understand contributing factors that lead to high ozone incidents.
2. Finalize list of voluntary actions that can be taken during the 2018-2019 winter ozone season and find ways record, reward, and recognize these actions.
    a. Explore activists' offer to produce publicity piece
    b. Improve upon 2013 efforts by tracking and reporting
    c. Expand parties involved and aware of actions proposed and taken
3. Foster communication between different sub-groups to increase awareness and understanding.

Long-Term:

1. Improve the accuracy of inventories and modeling.
2. Explore reasonable pathways to decrease high ozone incidents.
3. Assemble and provide informative and accurate updates about actions being taken.

3. Procedures and Framework for Action/Work Products

Decision-Making Framework:

1. The Steering Committee will develop and guide the UBOWG agenda and working focus.
    a. Steering Committee is composed of 1 representative each from 1) UDAQ, 2) Ute Tribe, 3) industry (four representatives with a sole unified vote), 4) county and municipal government, 5) environmental and community advocacy groups, 6) technical and academic groups
    b. The UBOWG will only take group action if approved by full consensus of the Steering Committee.

    c. If consensus cannot be reached, UBOWG will not undertake formal group action on that topic or issue.
2. UBOWG will be led and organized by a Group Facilitator to be selected by the Steering Committee.
3. UBOWG will hold large group meetings at least quarterly and may hold the meetings as often as monthly by approval of the full Steering Committee. UBOWG meeting times will be announced by email to all members. Individuals may join the UBOWG group email list by emailing the UBOWG Facilitator or registering at the UBOWG website.
    a. If a group member is found to be disruptive, the member will be given a warning upon approval of the Steering Committee.
    b. If the group member disruption continues, the member may be asked to discontinue participation after approval of the Steering Committee.
4. UBOWG may produce written work products with findings, recommendations, or requests only upon approval by the Steering Committee.
    a. Information and working documents may be placed into a protected work product library on the UBOWG website
        i. If the document is a product of UBOWG or a UBOWG sub-group, it may be posted only after full approval by the Steering Committee.
        ii. Work products placed into the work product library will not include UBOWG's name or endorsement.
    b. Individual UBOWG members may use and disseminate the information in the work product library under their own names and with their own additions or edits.

Message

From: Marie Bradshaw Durrant [MBDurrant@rqn.com]
Sent: 5/23/2019 7:33:23 PM
To: 'aaverett@sunrise-eng.com' [aaverett@sunrise-eng.com]; 'Adrienne.Sandoval@andeavor.com' [Adrienne.Sandoval@andeavor.com]; 'amyc@utetribe.com' [amyc@utetribe.com]; 'Angela.Zivkovich@anadarko.com' [Angela.Zivkovich@anadarko.com]; 'ashley@publiclandsolutions.org' [ashley@publiclandsolutions.org]; 'bstringer@uintah.utah.gov' [bstringer@uintah.utah.gov]; 'Rhammer@SLRconsulting.com' [Rhammer@SLRconsulting.com]; 'bmensinger@trinityconsultants.com' [bmensinger@trinityconsultants.com]; 'Chad.Schlichtemeier@anadarko.com' [Chad.Schlichtemeier@anadarko.com]; 'chelsea.cantrelle@epenergy.com' [chelsea.cantrelle@epenergy.com]; 'CColclasure@bwenergylaw.com' [CColclasure@bwenergylaw.com]; Dresser, Chris [Dresser.Chris@epa.gov]; Beeler, Cindy [Beeler.Cindy@epa.gov]; Smith, Claudia [Smith.Claudia@epa.gov]; Bean, Clayton [bean.clayton@epa.gov]; 'corey.jones@epenergy.com' [corey.jones@epenergy.com]; 'Daniel.D.Pring@andeavor.com' [Daniel.D.Pring@andeavor.com]; 'dbrown@tricountyhealth.com' [dbrown@tricountyhealth.com]; 'dmcneill@utah.gov' [dmcneill@utah.gov]; 'debbie@breatheutah.org' [debbie@breatheutah.org]; 'Douglas.Jordan@encana.com' [Douglas.Jordan@encana.com]; 'Eoman@altamontenergy.com' [Eoman@altamontenergy.com]; 'eehrmantraut@SLRconsulting.com' [eehrmantraut@SLRconsulting.com]; 'evernon@blm.gov' [evernon@blm.gov]; 'gtodd@duchesne.utah.gov' [gtodd@duchesne.utah.gov]; 'huy.tran@usu.edu' [huy.tran@usu.edu]; 'jpatterson@ndnlaw.com' [jpatterson@ndnlaw.com]; 'James.woodall@encana.com' [James.woodall@encana.com]; 'jwoodland@crescentpointenergy.com' [jwoodland@crescentpointenergy.com]; 'Jean.semborski@cop.com' [Jean.semborski@cop.com]; 'joe.sager@epenergy.com' [joe.sager@epenergy.com]; 'John.Spencer@simplot.com' [John.Spencer@simplot.com]; Ex. 6 Personal Privacy (PP); 'jmathis@tricountyhealth.com' [jmathis@tricountyhealth.com]; 'Jhirschi@enervest.net' [Jhirschi@enervest.net]; 'Karen_Pratt@xtoenergy.com' [Karen_Pratt@xtoenergy.com]; 'kburdick@Duchesne.utah.gov' [kburdick@Duchesne.utah.gov]; 'Lolsen@altamontenergy.com' [Lolsen@altamontenergy.com]; Lexie Wilson [lexiewilson@utah.gov]; 'lonnief@utetribe.com' [lonnief@utetribe.com]; Marie Bradshaw Durrant [MBDurrant@rqn.com]; 'mariek@utetribe.com' [mariek@utetribe.com]; 'marc.mansfield@usu.edu' [marc.mansfield@usu.edu]; mberger@utah.gov; 'mstewart@redleafinc.com' [mstewart@redleafinc.com]; Garvey, Megan [garvey.megan@epa.gov]; miken@utetribe.com; minnieg@utetribe.com; Morales, Monica [Morales.Monica@epa.gov]; 'rpage@ie-cos.com' [rpage@ie-cos.com]; 'rhrenko-browning@utahpetroleum.org' [rhrenko-browning@utahpetroleum.org]; 'Ryan.Clerico@enefit.com' [Ryan.Clerico@enefit.com]; 'Ryan@kairosaerospace.com' [Ryan@kairosaerospace.com]; 'Ryan.Swanson@epenergy.com' [Ryan.Swanson@epenergy.com]; 'scottchew@le.utah.gov' [scottchew@le.utah.gov]; Jackson, Scott [Jackson.Scott@epa.gov]; 'seth.lyman@usu.edu' [seth.lyman@usu.edu]; 'svance@utah.gov' [svance@utah.gov]; 'Spencer_Kimball@eogresources.com' [Spencer_Kimball@eogresources.com]; 'ssiffring@westernenergyalliance.org' [ssiffring@westernenergyalliance.org]; 'Thomas.H.Gibbons@andeavor.com' [Thomas.H.Gibbons@andeavor.com]; 'trang.tran@usu.edu' [trang.tran@usu.edu]; 'ttodd@utah.gov' [ttodd@utah.gov]; 'val.oman@epenergy.com' [val.oman@epenergy.com]; 'vince.christensen@simplot.com' [vince.christensen@simplot.com]; 'jmcqueen@crescentpointenergy.com' [jmcqueen@crescentpointenergy.com]; 'Andrea.Olsen@Simplot.com' [Andrea.Olsen@Simplot.com]; 'cpennell@utah.gov' [cpennell@utah.gov]; Nancy Daher [ndaher@utah.gov]; 'amatheson@utah.gov' [amatheson@utah.gov]; 'wesadams@utah.gov' [wesadams@utah.gov]; 'twiseman@utah.gov' [twiseman@utah.gov]; 'randy.hughes@middleforkep.com' [randy.hughes@middleforkep.com]; 'rob.zaback@middleforkep.com' [rob.zaback@middleforkep.com]; 'Jillian.Yamartino@anadarko.com' [Jillian.Yamartino@anadarko.com]
Subject: EPA Advance Notice of Proposed Rulemaking - ERC Banking
Attachments: 2019 0524 EPA Advance Notice of Proposed Rulemaking - ERC bank.pdf

Here is a copy of the proposed rulemaking for the emissions bank – should show up in the Federal Register tomorrow. Thanks to Bob Hammer for providing this!

Marie

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This document is scheduled to be published in the
Federal Register on 05/24/2019 and available online at
https://federalregister.gov/d/2019-10798, and on govinfo.gov

6560-50-P

ENVIRONMENTAL PROTECTION AGENCY

40 CFR Part 49

[EPA-R08-OAR-2019-0002; 9991-98-Region 8]

Federal Implementation Plan to Establish a Bank for Ozone Precursor Emission Reduction Credits from Existing Sources on Indian Country Lands within the Uinta Basin Ozone Nonattainment Area

AGENCY: Environmental Protection Agency (EPA).

ACTION: Advance notice of proposed rulemaking.

SUMMARY: The purpose of this Advance Notice of Proposed Rulemaking (ANPRM) is to solicit broad feedback on different approaches to establishing a voluntary emission reduction credit (ERC) bank for ozone precursors, specifically volatile organic compounds (VOCs) and nitrogen oxides (NO_X), as part of a Clean Air Act (CAA) Federal Implementation Plan (FIP) applicable to stationary sources on Indian country lands within the Uintah and Ouray Indian Reservation (U&O Reservation) that are part of the Uinta Basin Ozone Nonattainment Area. The EPA designated portions of the "Uinta Basin" region nonattainment for the 2015 Ozone NAAQS, effective August 3, 2018. The ERCs described in this ANPRM could be generated and used for several air quality planning purposes: assisting in achievement of the ozone National Ambient Air Quality Standard (NAAQS), general conformity demonstrations, and nonattainment new source review (NNSR) permitting related to development of new VOC and NO_X emissions sources in Indian country portions of the Uinta Basin Ozone Nonattainment Area in Utah. We

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are also inviting comment on the potential for the bank to interact with sources that are outside the nonattainment area or the U&O Reservation.

DATES: Comments must be received on or before **[Insert date 45 days after date of publication in the FEDERAL REGISTER]**.

ADDRESSES: Submit your comments, identified by Docket ID No. EPA-R08-OAR-2019-0002, at http://www.regulations.gov. Follow the online instructions for submitting comments. Once submitted, comments cannot be edited or removed from www.regulations.gov. The EPA may publish any comment received to its public docket. Do not submit electronically any information you consider to be Confidential Business Information (CBI) or other information whose disclosure is restricted by statute. Multimedia submissions (audio, video, etc.) must be accompanied by a written comment. The written comment is considered the official comment and should include discussion of all points you wish to make. The EPA will generally not consider comments or comment contents located outside of the primary submission (i.e., on the web, cloud, or other file sharing system). For additional submission methods, the full EPA public comment policy, information about CBI or multimedia submissions, and general guidance on making effective comments, please visit http://www2.epa.gov/dockets/commenting-epa-dockets.

FOR FURTHER INFORMATION CONTACT: Chris Dresser, U.S. EPA, Region 8, Air Program, Mail Code 8P-AR, 1595 Wynkoop Street, Denver, Colorado 80202-1129, (303) 312-6385, dresser.chris@epa.gov.

SUPPLEMENTARY INFORMATION: Throughout this document, "reviewing authority," "we," "us" and "our" refer to the EPA.

ANPRM: Advance Notice of Proposed Rulemaking.

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APA: The Administrative Procedure Act.

Act or CAA: Clean Air Act, unless the context indicates otherwise.

CBI: Confidential Business Information.

EIP: Economic Incentive Programs.

EPA: The United States Environmental Protection Agency.

ERC: Emission Reduction Credit.

FIP: Federal Implementation Plan.

NAAQS: National Ambient Air Quality Standards.

NAICS: North American Industry Classification System.

NESHAP: National Emission Standards for Hazardous Air Pollutants.

NO_x: Nitrogen oxides.

NPRM: Notice of Proposed Rulemaking.

NNSR: Nonattainment New Source Review.

NSR: New Source Review.

NTTAA: National Technology Transfer and Advancement Act.

OMB: Office of Management and Budget.

RACT: Reasonably Available Control Technology.

RFA: Regulatory Flexibility Act.

RFP: Reasonable Further Progress.

SIP: State Implementation Plan.

TAR: Tribal Authority Rule.

TAS: Treatment in the same manner as a state.

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TIP: Tribal Implementation Plan.

TPY: Tons Per Year.

UDEQ: Utah Department of Environmental Quality's Division of Air Quality.

U&O Reservation or the Reservation: Uintah & Ouray Indian Reservation.

VOC: Volatile organic compound(s).

This preamble is organized as follows:

I. General Information
- A. Would this potential action apply to me?
- B. What should I consider as I prepare my comments to the EPA?
- C. Where can I get a copy of this document and other related information?

II. Purpose of this Advance Notice of Proposed Rulemaking

III. What is an Emission Reduction Credit Bank?

IV. Background on the U&O Reservation

V. Areas Where the EPA is Requesting Comment
- A. Conceptual support for an EPA-run U&O ERC bank.
- B. Participation in the U&O ERC bank.
- C. ERC bank format.
- D. Creditable emission reductions.
- E. Trading of ERCs.
- F. Use of ERCs.
- G. Withdrawal of ERCs from the bank.
- H. Emissions reductions achieved prior to the effective date of final U&O ERC banking rule.
- I. Geographic considerations and interaction with Utah state land CAA planning requirements.
- J. General comments.

VI. Statutory and Executive Order Reviews

I. General Information

A. Would this potential action apply to me?

Entities potentially affected by this upcoming proposed FIP consist of existing sources of emissions of ozone precursors (VOC and NO_x) on Indian country lands that are both (1) within

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the U&O Reservation[1] and (2) part of the Uinta Basin Ozone Nonattainment Area. All the Indian country lands within the Uinta Basin Ozone Nonattainment Area of which the EPA is aware are within the U&O Reservation. Further, all of the Ute Indian Tribe Indian country lands of which the EPA is aware are located within the Reservation.[2] To the extent that there are Ute Indian Tribe dependent Indian communities under 18 U.S.C. 1151(b) or allotted lands under 18 U.S.C. 1151(c) that are located outside the exterior boundaries of the Reservation, those lands would not be covered by this FIP unless the EPA or the Tribe demonstrates that the Tribe has jurisdiction over the area. In addition, there are parts of the Uinta Basin Ozone Nonattainment Area that are not within Indian country. Any proposed FIP will not apply to any sources on non-Indian-country lands, including any non-Indian-country lands within the exterior boundaries of the Reservation. The EPA expects that entities with operations in the oil and natural gas production and natural gas processing segments of the oil and natural gas sector would be the primary depositors of ERCs in a U&O ERC bank, while new or modified major sources of VOC or NO_X emissions in various source categories would be the primary purchasers of banked ERCs to

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[1] *See* discussion at section IV below, for more information on the establishment of the Reservation.

[2] Under the CAA, lands held in trust for the use of an Indian tribe are reservation lands within the definition at 18 U.S.C. 1151(a), regardless of whether the land is formally designated as a reservation. *See* 63 FR 7254, 7258 (Feb. 12, 1998) ("Tribal Authority Rule"); *Arizona Pub. Serv. Co. v. EPA*, 211 F.3d 1280, 1285-86 (D.C. Cir. 2000). EPA's references in this FIP to Indian country lands within the exterior boundaries of the U&O Reservation include any such tribal trust lands that may be acquired by the Ute Indian Tribe.

In 2014, the U.S. Court of Appeals for the D.C. Circuit addressed EPA's authority to promulgate a FIP establishing certain CAA permitting programs in Indian country. *Oklahoma Dept. of Environmental Quality v. EPA*, 740 F. 3d 185 (D.C. Cir. 2014). In that case, the court recognized EPA's authority to promulgate a FIP to directly administer CAA programs on Indian reservations but invalidated the FIP at issue as applied to non-reservation areas of Indian country in the absence of a demonstration of an Indian tribe's jurisdiction over such non-reservation area. Because the current proposed rule would apply only on Indian country lands that are within the exterior boundaries of the U&O Reservation, *i.e.*, on reservation areas, the *Oklahoma* court decision is not implicated.

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support Nonattainment New Source Review (NNSR) permitting. However, other source categories may choose to participate in either depositing ERCs or purchasing banked ERCs to support NNSR permitting of new or modified major or minor sources of VOC or NO_x emissions.

Table 1 – Source Categories Affected by this Anticipated Action

Industry Category	NAICS Code	Examples of Regulated Entities/ Description of Industry Category
Oil and Gas Production/Operations	21111	Exploration for crude petroleum and natural gas; drilling, completing, and equipping wells; operation of separators, emulsion breakers, desilting equipment, and field gathering lines for crude petroleum and natural gas; and all other activities in the preparation of oil and gas up to the point of shipment from the producing property. Production of crude petroleum, the mining and extraction of oil from oil shale and oil sands, the production of natural gas, sulfur recovery from natural gas, and the recovery of hydrocarbon liquids from oil and gas field gases.
Crude Petroleum and Natural Gas Extraction	211111	Exploration, development and/or the production of petroleum or natural gas from wells in which the hydrocarbons will initially flow or can be produced using normal pumping techniques or production of crude petroleum from surface shales or tar sands or from reservoirs in which the hydrocarbons are semisolids.
Natural Gas Liquid Extraction	211112	Recovery of liquid hydrocarbons from oil and gas field gases; and sulfur recovery from natural gas.
Drilling Oil and Gas Wells	213111	Drilling oil and gas wells for others on a contract or fee basis, including spudding in, drilling in, redrilling, and directional drilling.
Support Activities for Oil and Gas Operations	213112	Performing support activities on a contract or fee basis for oil and gas operations (except site preparation and related construction activities) such as exploration (except geophysical

		surveying and mapping); excavating slush pits and cellars, well surveying; running, cutting, and pulling casings, tubes, and rods; cementing wells, shooting wells; perforating well casings; acidizing and chemically treating wells; and cleaning out, bailing, and swabbing wells.
Engines (Spark Ignition and Compression Ignition) for Electric Power Generation	2211	Provision of electric power to support oil and natural gas production where access to the electric grid is unavailable.
Fossil Fuel Electric Power Generation	221112	Operating fossil fuel powered electric power generation facilities using fossil fuels, such as coal, oil, or gas, in internal combustion or combustion turbine conventional steam process to produce electric energy. Electric energy production is provided to electric power transmission systems or to electric power distribution systems.
Petroleum Bulk Stations and Terminals	424710	Bulk liquid storage facilities primarily engaged in the merchant wholesale distribution of crude petroleum and petroleum products, including liquefied petroleum gas.

This list is not intended to be exhaustive, but rather provides a guide for readers regarding entities potentially affected by this anticipated action. If you have any questions regarding the applicability of this potential action to a particular entity, contact the appropriate person listed in the **FOR FURTHER INFORMATION CONTACT** section.

II. Purpose of This Advance Notice of Proposed Rulemaking

The EPA is issuing this ANPRM to solicit comment on how to best design and implement an ERC banking and trading program for stationary sources located on the Indian

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country portion of the Uinta Basin Ozone Nonattainment Area[3]. (As discussed previously, the Indian country lands within the Uinta Basin Ozone Nonattainment Area to which a U&O ERC bank would apply are on the U&O Reservation. There are, in addition, portions of the nonattainment area that are outside of Indian country; sources in those areas are subject to state law.[4]) Allowing sources to use an EPA-run bank to credit eligible emissions reductions would serve three purposes:

1. The requirement to obtain offsets (as ERCs) for permitting new or modified major sources would likely incentivize industry to voluntarily implement controls on existing operations, which would lead to emissions reductions sooner than would otherwise occur. We expect, based on the existing emissions inventory, that the primary generators of ERCs will be minor oil and natural gas production sources, while the primary users of ERCs as compensating emissions reductions will be new or modified major sources.
2. The ability to bank emissions credits would facilitate continued economic development by providing a market for compensating emissions reductions and offsets, such as those required to construct new and modified major sources in the nonattainment area. The Uinta Basin Ozone Nonattainment Area is classified as a Marginal nonattainment area for the 2015 ozone NAAQS. At the Marginal level of nonattainment, offsets for permitting

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[3] Effective August 3, 2018, certain parts of the Uinta Basin were classified as a Marginal nonattainment area for the 2015 ozone NAAQS. 83 FR 25776, 25837 (June 4, 2018); *see also* information and links posted at https://www.epa.gov/ozone-designations/additional-designations-2015-ozone-standards.

[4] As noted previously, our expectation is that the bank will apply only to stationary sources on Indian country lands within the U&O Reservation that are part of the Uinta Basin Ozone Nonattainment Area, but we are taking comment on the potential for the bank to interact with sources that are outside the nonattainment area or the U&O Reservation.

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new or modified major sources could be purchased and used at a ratio of 1.1 ton of emissions reductions of an ozone precursor to every 1 ton of new emissions added to the Basin.[5] This requirement for major source offsets ensures a declining emissions trend, while still allowing new major source development.[6] As discussed below, other options exist to increase the effectiveness of this program as a means of reducing emissions and improving air quality.

3. The ability to bank emissions credits for later use to satisfy CAA general conformity requirements applicable to federal actions would minimize delays in such actions.

To ensure the integrity of the program and its consistency with the CAA, to qualify as ERCs, emissions reductions are required to be quantifiable, enforceable, permanent, and surplus of CAA requirements.[7]

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[5] CAA section 182(a)(4), 42 U.S.C. 7511a(a)(4) (setting general offset requirement for Marginal Areas).

[6] Although minor sources are not subject to this major source individual offset requirement, the EPA believes that 1:1 compensating emissions reductions could be the simplest way to show that a new minor source does not "cause or contribute" to a NAAQS violation. The EPA is open to ideas about other ways to make this demonstration.

[7] For detailed discussion of the meaning of these terms (quantifiable, enforceable, permanent, and surplus) in this context, *see Improving Air Quality with Economic Incentive Programs*, EPA-452/R-01-001 (EPA Office of Air and Radiation, 2001) ("EIP Guidance," available at https://www.epa.gov/sites/production/files/2015-07/documents/eipfin.pdf), chapter 4 (describing these "fundamental principles" of all banking and trading programs). For additional authorities establishing that CAA emission reduction credits must be quantifiable, enforceable, permanent, and surplus, *see* CAA section 173(c), 42 U.S.C. 7503(c) (requiring that emissions offsets in nonattainment permitting be "not otherwise required," "in effect" by the time a source commences operation, and "enforceable"); 40 CFR 51.165(a)(3)(ii)(C)(1)(i) (requiring that SIPs and TIPs provide that emission reduction credits from shutdowns or operational curtailments must be surplus, quantifiable, enforceable, and permanent); 40 CFR part 51, subpart U (rules for "mandatory" economic incentive programs submitted as part of satisfying SIP requirements under CAA sections 182 and 187) (stating that programs must be "state and federally enforceable," and that "[p]rograms in nonattainment areas for which credit is taken in attainment and RFP demonstrations shall be designed to ensure that the effects of the program are quantifiable and permanent over the entire duration of the program, and that the credit taken is limited to that which is surplus."); *Emissions Trading Policy Statement*, 51 FR 43814, 43831 (Dec. 4, 1986) ("To assure that emissions trades do not contravene relevant requirements of the Clean Air Act, only reductions which are surplus, enforceable, permanent, and quantifiable can qualify as ERCs and be banked or used in an emissions trade."); *Emissions Offset Interpretive Ruling*, 44 FR 3274, 3274-76 (Jan. 16, 1979)

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The CAA allows the establishment of emissions banking and trading systems to meet applicable requirements, and allows for flexibility and tailoring of the program to specific geographic areas.[8] As discussed in detail in Section V of this ANPRM, the EPA is requesting comments on a range of elements concerning whether and how an ERC banking rule should be designed and implemented for the Indian country portion of the Uinta Basin Ozone Nonattainment Area. We will take this feedback into consideration in developing a notice of proposed rulemaking (NPRM) for a FIP for crediting ozone precursor emissions reductions from existing Indian country sources within the Uinta Basin Ozone Nonattainment Area.

III. What is an Emission Reduction Credit Bank?

The following information is meant to give the reader a general overview of ERC banks. Specifics may vary depending on the design of the actual regulatory program.

Generally speaking, source owners or operators can generate emissions reductions using a number of approaches, including curtailing emissions or shutting down emissions units. These emissions reductions can then be certified as ERCs and deposited in a bank provided they meet relevant requirements. ERCs can thus be viewed as financial incentives that can be saved for later use as emissions offsets by the depositor or sold or traded at the market price to other sources needing emissions offsets.

("Emissions reductions achieved by shutting down an existing source or curtailing production or operating hours may be generally credited for offsets if they … are surplus, permanent, quantifiable, and federally enforceable…").

[8] *See, e.g.,* CAA sections 110(a)(2)(A), 42 U.S.C 7410(a)(2)(A), and 172(c)(6) (state implementation plans must have "control measures, means, or techniques (including economic incentives such as fees, marketable permits, and auctions of emissions rights)"; *see also* EIP Guidance.

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ERCs are generated when owners or operators of a facility or source reduce emissions of criteria pollutants[9] or their precursors below any applicable regulatory requirements, while complying with all other applicable requirements of the CAA.[10] ERCs can be generated from permanent shutdown and removal of equipment; upgrade or retrofit to more stringent emissions controls; or change of process, methods, or operating guidelines that would affect emissions. These control methods and technologies must result in real, quantifiable, enforceable, and permanent reductions in emissions, and the reductions must be surplus of CAA requirements.[11]

The overall purpose of an ERC bank is to apply market-based strategies to encourage reductions in emissions for an area, which may help meet shared air quality goals. An ERC bank promotes flexibility and innovation in complying with state and federal air emissions requirements established in a SIP/FIP/TIP and SIP/FIP/TIP-approved air permitting programs. This flexibility should allow for the achievement of air quality goals (e.g., SIP/FIP/TIP requirements) more quickly and at a lower cost while still complying with all applicable requirements of the CAA.

As mentioned in Section I, we expect that a principal use of emission reduction credits will be to offset new and modified major source emissions as part of NNSR permitting. Sections 172(c)(5) and 173 of Part D of title I of the CAA and EPA's implementing regulations at 40 CFR 51.165 contain the NSR requirements for areas designated nonattainment for a NAAQS. NNSR

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[9] While lead is a criteria pollutant, ERC banks should not address lead emissions. *See* EIP Guidance.
[10] An ERC must not conflict with or override other CAA requirements that may apply to an area or source(s) (*e.g.*, part D nonattainment NSR offset requirements or part C PSD requirements) regardless of the attainment classification of an area. *See* EIP Guidance at 15.
[11] *See* n. 7, above.

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only applies to pollutants or their precursors for which the area is designated as nonattainment for a NAAQS under the CAA. The NNSR program has specific emissions thresholds for determining which new sources or modifications of existing sources are "major" based on the nonattainment classification of the specific pollutant.[12] Once a stationary source is subject to the major NNSR program, the source must meet several criteria to receive a preconstruction permit. The most significant of these requirements are the application of the Lowest Achievable Emissions Rate (LAER) to the stationary source or project and the requirement to offset potential emissions increases from the project with decreases in actual emissions from the same or other stationary sources located in the same nonattainment area or a nonattainment area of equal or higher classification.

Under existing EPA regulations, source owners seeking permits for construction of new or modified minor sources in a nonattainment area of Indian country must demonstrate that the source will not cause or contribute to a NAAQS violation. 40 CFR 49.155(a)(7)(ii). The EPA's Indian Country Oil and Natural Gas True Minor Source FIP allowed streamlined permitting of new and modified minor oil and natural gas sources on Indian country lands within the U&O Reservation before the designation of the Uinta Basin Ozone Nonattainment Area, but that FIP does not currently provide for streamlined permitting of sources in the nonattainment area.[13]

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[12]The "major stationary source" threshold for a marginal and moderate nonattainment areas is 100 tpy for a pollutant or precursor. NNSR also applies to existing major stationary sources that undertake a "major modification," which occurs when the change ultimately results in a "significant net" emissions increase of the nonattainment pollutant (significance rates are defined in 40 CFR 51.165(a)(1)(v)). The significance threshold is lower in certain nonattainment areas with higher degrees of nonattainment, with the specific level based on the area's nonattainment classification.

[13] *See* 40 CFR 49.101(b)(1)(v).

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Instead, those sources must obtain source-specific permits before beginning construction, under the rules at 40 CFR 49.151 through 49.165.[14]

IV. Background on the U&O Reservation

The Ute Indian Tribe is a federally recognized Indian tribe organized under the Indian Reorganization Act of 1934,[15] with its Constitution and By-Laws adopted by the Tribe on December 19, 1936, and approved by the Secretary of the Interior on January 19, 1937.[16] The Uintah and Ouray Indian Reservation was formerly the Uintah Valley and Uncompahgre Reservations, which were established in 1861 and 1882, respectively.[17] The Tribe's Constitution and By-Laws reorganized three Ute Tribes into one, and clarified that tribal jurisdiction within the U&O Reservation extends to the territory within the original Uintah and Uncompahgre Reservations, which was later enlarged through the Hill Creek Extension Act of 1948.[18] The U&O Reservation currently includes all Indian country lands within its exterior boundaries, as

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[14] On May 8, 2018, EPA proposed to amend the Indian Country Oil and Natural Gas True Minor Source FIP to allow the FIP to apply in the Uintah Basin Ozone Nonattainment Area. *See* 83 FR 20775.

[15] *See* 83 FR 34863, 34866 (July 23, 2018) (list of federally recognized tribes); 48 Stat. 984, 25 U.S.C. 5123 (Indian Reorganization Act).

[16] Constitution and By-Laws of the Ute Indian Tribe, available at https://www.loc.gov/law/help/american-indian-consts/PDF/37026342.pdf.

[17] The U&O Reservation was established for the Ute Indian Tribe under Executive Order in 1861, 1 Kapp. 900, as confirmed by the Act of May 5, 1864, 13 Stat. 63, and under Executive Order of January 5, 1882, then enlarged through the Hill Creek Extension Act of 1948, 62 Stat. 72. The Reservation has been addressed in multiple federal court decisions, including *Ute Indian Tribe v. Utah*, 521 F. Supp. 1072, 1155 (D. Utah 1981); *Ute Indian Tribe v. Utah*, 716 F.2d 1298 (10th Cir. 1983); *Ute Indian Tribe v. Utah*, 773 F.2d 1087 (10th Cir. 1985) (en banc), *cert. denied*, 479 U.S. 994 (1986); *Hagen v. Utah*, 510 U.S. 399 (1994); *Ute Indian Tribe v. Utah*, 935 F. Supp. 1473 (D. Utah 1996); *Ute Indian Tribe v. Utah*, 114 F.3d 1513 (10th Cir. 1997), *cert. denied*, 522 U.S. 1107 (1998); *Ute Indian Tribe v. Utah*, 790 F.3d 1000 (10th Cir. 2015), *cert. denied*, 136 S. Ct. 1451 (U.S. Mar. 21, 2016); and *Ute Indian Tribe v. Myton*, 835 F.3d 1255 (10th Cir. 2016), *cert. dismissed*, 137 S.Ct. 2328 (2017). As a result of this line of cases, there are some non-Indian-country lands within the exterior boundaries of the Uintah and Ouray Indian Reservation.

[18] 62 Stat. 72.

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defined by the 1861 and 1882 Executive Orders, the Act of May 5, 1864, the Hill Creek Extension Act of 1948, and subsequent court decisions.[19]

Pursuant to CAA section 301(d),[20] the EPA is authorized to treat eligible Indian tribes in the same manner as states ("treatment as state" or TAS) for purposes of implementing CAA provisions over their entire reservations and over any other areas within their jurisdiction.[21] The Ute Indian Tribe has not applied for TAS for the purpose of administering a TIP under the CAA. Thus, there is currently no EPA-approved plan implementing the functions and provisions of the CAA on Indian country lands within the U&O Reservation. We anticipate that the U&O ERC banking rule for which the EPA is providing this advance notice of proposed rulemaking and soliciting comment would apply to the Indian country lands within the exterior boundaries of the U&O Reservation that are part of the Uinta Basin Ozone Nonattainment Area.

V. Areas Where the EPA is Requesting Comment

For purposes of formulating a Reservation-specific ERC banking rule, the EPA is seeking comment on the following issues:

A. Conceptual support for an EPA-run U&O ERC bank: Should the EPA proceed with plans to propose a rule establishing such a voluntary ERC bank? The EPA seeks comment on whether industry (and potentially others) would use an ERC bank for the Indian country lands within the U&O Reservation that are part of the Uinta Basin Ozone Nonattainment Area. Are there

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[19] *See* n. 16, above.
[20] *See* 42 U.S.C. 7601(d).
[21] *See* 63 FR 7254-57 (Feb. 12, 1998) (explaining that CAA section 301(d) includes a delegation of authority from Congress to eligible Indian tribes to implement CAA programs over all air resources within the exterior boundaries of their reservations).

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any reasons not to create a U&O ERC bank, or are there suggestions to handle surplus emission reduction crediting through another approach? Finally, are there existing state-run ERC banking systems that may serve as a good example for developing a U&O ERC bank?

B. Participation in the U&O ERC bank: The EPA expects that the principal clients of a U&O ERC bank would be industrial sources within the Indian country portions of the Uinta Basin Ozone Nonattainment Area depositing emission reduction credits for sale or for later use to support future development, as well as new and modified industrial sources needing offsets necessary to obtain a major NNSR permit. We seek comment on what other entities (besides companies implementing voluntary emissions controls and/or companies needing offsets to support new development) should be permitted to participate in a U&O ERC bank. Such entities might include non-governmental organizations, federal government agencies, local government, the Ute Indian Tribe and others. Are there any reasons to preclude any entities from purchasing ERC credits from such a bank?

C. ERC bank format: The EPA seeks comment on the format and features of a U&O ERC bank. It is expected that (as with most ERC banks) a database would be created to track and manage ERCs, through their deposit, trading and use, that will be publicly available online. The EPA solicits comment on this expectation. Additionally, should the owner of an ERC be required to deposit the ERC into the bank before using it as an offset, in order to centralize tracking? Or, if an emissions reduction is created for a specific project, can it be evaluated as part of the project and avoid the U&O ERC bank? The EPA seeks comments on what information should be maintained in the database for each banking action.

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D. Creditable emissions reductions: The EPA intends to propose a rule that specifically outlines what emissions reductions qualify as creditable for deposit in a U&O ERC bank. Generally, qualifying ERCs are limited to emissions reductions that are real, quantifiable, enforceable, permanent, and surplus of CAA requirements. Such ERCs are typically generated by permanently shutting down equipment, modifying a process (i.e., using a lower VOC/sulfur containing material), or by adding emissions controls beyond those required by any applicable regulation.

Some state-run ERC banks require that a certain percentage of reductions be removed and made ineligible for future use to ensure an environmental benefit to the banking system. For instance, if an operator achieves a 10 tpy reduction by implementing an emissions control on a given source, some percentage (such as 10%) may be retired for environmental benefit, and only 9 tpy would be deposited in the ERC bank for future offsets or compensating emissions reductions. This ensures that more accelerated progress is made towards attainment. The EPA seeks comment on whether this practice should be implemented for a U&O ERC bank, and if so, at what percentage?

Given the seasonal nature of ozone generation in the Uinta Basin, are there legally and technically supported approaches to allowing seasonal emissions reductions to be credited? Should seasonal limitations be placed on the program? For instance, should the rule prevent summertime reductions from being used to support the addition of wintertime emissions? How should the ERC banking rule treat emissions reductions that occur from emissions unit shutdowns? What requirements should apply to shut-down equipment to ensure it meets the requirement to be a permanent reduction? There are restrictions on the use of reductions

occurring from equipment shutdowns in 40 CFR 51.165(a)(3)(ii)(C)(1), such as only being eligible for use if the shutdown occurred after the last day of the baseline year for the plan. Additionally, use of reductions from equipment shutdowns must be restricted to prohibit operation of that unit elsewhere in the nonattainment area. Should the use of reductions from shut-down equipment be restricted further, such as disallowing operation in a broader area outside of the nonattainment area, or requiring destruction of the unit?

E. Trading of ERCs: A principal use of an ERC bank would be to allow companies in need of emissions offsets to construct new and modified sources to purchase those credits from companies that have permanently reduced emissions and deposited those ERCs in the bank. The EPA expects that a U&O ERC bank would allow the purchase and exchange of ERCs, and such exchanges would be publicly documented. The EPA further anticipates that the price of ERCs would be determined by the open market based on the demand for such ERCs. The EPA intends to propose to require documentation from both the company selling a credit and the company acquiring the credit in order to process that transaction and would make publicly available such information – including the number of ERCs purchased, the method of emissions reduction, and the purchase price. The EPA seeks comment on this expectation and any input on what additional information should be provided to document transactions within the anticipated U&O ERC bank database.

F. Use of ERCs: In addition to using banked ERCs as offsets for new and modified major sources, these emissions reductions may also be used to show that a new or modified minor source does not cause or contribute to an ozone NAAQS violation, or to satisfy general conformity requirements. If such reductions are not available within the existing inventory of

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a company's emissions sources or are needed by a federal agency to demonstrate general conformity for a specific action, the U&O ERC bank could be used to facilitate the purchase of available ERCs. In such a case, the necessary amount of ERCs would be purchased from one (or more) entities in possession of ERCs. Documentation of the transaction would be provided to the EPA, and those credits would be withdrawn from the bank when used to support a permit action. The EPA intends to propose a U&O ERC banking rule that describes the specifics of this process, consistent with the principles and requirements described in the EIP Guidance.[22] However, the EPA solicits comments on any additional considerations and flexibilities that should be made to allow this process to function efficiently for participants within the U&O Reservation. A primary goal of the program is to allow eligible ERCs to be certified for eventual use as offsets in accordance with major NNSR and general conformity requirements. Are there any other uses of an ERC that EPA should be evaluating, such as for discretionary use in minor NNSR?

G. Withdrawal of ERCs from the bank: The EPA intends to evaluate banked credits for compliance with the "surplus of Clean Air Act" requirement at the time of their use as compensating offsetting emissions (e.g., upon issuance of a permit). In the event of future promulgation of emissions controls as part of a federal or tribal implementation plan, or to satisfy CAA requirements such as reasonably available control technology (RACT) or RFP, the EPA does not expect sources that have already provided offsets to need to pursue

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[22] All offsets used for the purpose of satisfying general conformity requirements must meet the regulatory requirements relating to offsets in 40 CFR 93.158(a)(5)(iii).

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additional offsetting emissions. The EPA seeks comment on this anticipated expectation and on whether any other factors should be considered. We also seek comment as to whether banked credits should be discounted or expire after some period of time, even if they remain surplus of CAA requirements.

H. Emissions reductions achieved before the effective date of final U&O ERC banking rule: The EPA expects that because the final 2015 Ozone Implementation Rule[23] defines a primary base year of 2017, that year will likely be an appropriate base year for the Uinta Basin Ozone Nonattainment Area banking and trading program. To allow for near-term surplus emissions reductions that would benefit air quality, the EPA intends to include as a component of the proposed rule that qualifying emissions reductions achieved before the final rule's effective date, but after the nonattainment baseline year, may be banked; effectively, any emissions reduction achieved after January 1, 2018. The EPA seeks comment on the inclusion of this flexibility.

I. Geographic considerations and interaction with Utah-managed CAA planning requirements: As explained previously, we anticipate that any proposed U&O ERC bank would only apply to sources on Indian country lands within the U&O Reservation that are within the Uinta Basin Ozone Nonattainment Area. There may, however, be situations where sources on land managed by Utah have a need for ERCs and wish to purchase them from a source in Indian country. Conversely, sources covered by the EPA-run bank may wish to purchase ERCs from

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[23] Implementation of the 2015 National Ambient Air Quality Standards for Ozone: Nonattainment Area State Implementation Plan Requirements. 83 FR 62998 (Dec. 6, 2018). https://www.govinfo.gov/content/pkg/FR-2018-12-06/pdf/2018-25424.pdf.

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a source managed by Utah. From a scientific standpoint, ozone precursor emissions are generally uniformly mixed across jurisdictions beneath the inversion during high-ozone events in the Uinta Basin Ozone Nonattainment Area; the original location within the nonattainment area of emissions (and emissions reductions) is irrelevant to the nonattainment area's overall ozone design values. However, as a legal matter, the EPA is limited in the scope of applying any potential U&O ERC bank rulemaking to sources in Indian country. Accordingly, we seek comment on whether, and under what criteria and constraints, an EPA-run bank for sources on the Indian country portion of the Uinta Basin Ozone Nonattainment Area should interact with any state-run bank that may be developed for sources on land under Utah CAA regulatory jurisdiction. We also seek comment on whether the EPA should pursue collaboration with Utah in allowing for cross-jurisdictional exchange of ERCs. Finally, is there any justification to allow the use, or banking of credits outside of the Uinta Basin Nonattainment Area, but within the general geographic extent of the Uinta Basin?

J. General comments: The EPA also invites the public's comment on any other questions associated with developing an emissions banking and trading program to address the goals described previously in the "Purpose" section of this ANPRM.

VI. Statutory and Executive Order Reviews

Under Executive Order 12866, entitled *Regulatory Planning and Review* (58 FR 51735, Oct. 4, 1993), the OMB has determined that this is a not a "significant regulatory action." Because this ANPRM does not propose or impose any requirements, and instead seeks comments and suggestions for the Agency to consider in possibly developing a subsequent proposed rule, the various statutes and Executive Orders that normally apply to rulemaking do

not apply in this case. Should the EPA subsequently determine to pursue a rulemaking, the EPA will address the statutes and Executive Orders as applicable to that rulemaking.

The EPA seeks any comments or information that would help the Agency ultimately to assess the potential impact of a rule on small entities pursuant to the Regulatory Flexibility Act (RFA) (5 U.S.C. 601 *et seq.*); to consider voluntary consensus standards pursuant to section 12(d) of the National Technology Transfer and Advancement Act of 1995 (NTTAA) (15 U.S.C. 272 note); to consider environmental health or safety effects on children pursuant to Executive Order 13045, entitled "Protection of Children from Environmental Health Risks and Safety Risks" (62 FR 19885, April 23, 1997); or to consider human health or environmental effects on minority or low-income populations pursuant to Executive Order 12898, entitled "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations" (59 FR 7629, Feb. 16, 1994).

The Agency will consider such comments during the development of any subsequent proposed rule.

List of Subjects in 40 CFR Part 49

Environmental protection, Administrative practices and procedures, Air pollution control, Indians, Indians-law, Indians-tribal government, Intergovernmental relations, reporting and recordkeeping requirements.

Dated: May 18, 2019.

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Debra Thomas,
Acting Regional Administrator,
EPA Region 8.

ED_005184A_00000148-00021

[FR Doc. 2019-10798 Filed: 5/23/2019 8:45 am; Publication Date: 5/24/2019]

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Message

From: Marie Bradshaw Durrant [MBDurrant@rqn.com]
Sent: 5/20/2019 7:49:54 PM
To: 'aaverett@sunrise-eng.com' [aaverett@sunrise-eng.com]; 'Adrienne.Sandoval@andeavor.com' [Adrienne.Sandoval@andeavor.com]; 'amyc@utetribe.com' [amyc@utetribe.com]; 'Angela.Zivkovich@anadarko.com' [Angela.Zivkovich@anadarko.com]; 'ashley@publiclandsolutions.org' [ashley@publiclandsolutions.org]; 'bstringer@uintah.utah.gov' [bstringer@uintah.utah.gov]; 'Rhammer@SLRconsulting.com' [Rhammer@SLRconsulting.com]; 'bmensinger@trinityconsultants.com' [bmensinger@trinityconsultants.com]; 'Chad.Schlichtemeier@anadarko.com' [Chad.Schlichtemeier@anadarko.com]; 'chelsea.cantrelle@epenergy.com' [chelsea.cantrelle@epenergy.com]; 'CColclasure@bwenergylaw.com' [CColclasure@bwenergylaw.com]; Dresser, Chris [Dresser.Chris@epa.gov]; Beeler, Cindy [Beeler.Cindy@epa.gov]; Smith, Claudia [Smith.Claudia@epa.gov]; Bean, Clayton [bean.clayton@epa.gov]; 'corey.jones@epenergy.com' [corey.jones@epenergy.com]; 'Daniel.D.Pring@andeavor.com' [Daniel.D.Pring@andeavor.com]; 'dbrown@tricountyhealth.com' [dbrown@tricountyhealth.com]; 'dmcneill@utah.gov' [dmcneill@utah.gov]; 'debbie@breatheutah.org' [debbie@breatheutah.org]; 'Douglas.Jordan@encana.com' [Douglas.Jordan@encana.com]; 'Eoman@altamontenergy.com' [Eoman@altamontenergy.com]; 'eehrmantraut@SLRconsulting.com' [eehrmantraut@SLRconsulting.com]; 'evernon@blm.gov' [evernon@blm.gov]; 'gtodd@duchesne.utah.gov' [gtodd@duchesne.utah.gov]; 'huy.tran@usu.edu' [huy.tran@usu.edu]; 'jpatterson@ndnlaw.com' [jpatterson@ndnlaw.com]; 'James.woodall@encana.com' [James.woodall@encana.com]; 'jwoodland@crescentpointenergy.com' [jwoodland@crescentpointenergy.com]; 'Jean.semborski@cop.com' [Jean.semborski@cop.com]; 'joe.sager@epenergy.com' [joe.sager@epenergy.com]; 'John.Spencer@simplot.com' [John.Spencer@simplot.com]; Ex. 6 Personal Privacy (PP) 'jmathis@tricountyhealth.com' [jmathis@tricountyhealth.com]; 'Jhirschi@enervest.net' [Jhirschi@enervest.net]; 'Karen_Pratt@xtoenergy.com' [Karen_Pratt@xtoenergy.com]; 'kburdick@Duchesne.utah.gov' [kburdick@Duchesne.utah.gov]; 'Lolsen@altamontenergy.com' [Lolsen@altamontenergy.com]; Lexie Wilson [lexiewilson@utah.gov]; 'lonnief@utetribe.com' [lonnief@utetribe.com]; Marie Bradshaw Durrant [MBDurrant@rqn.com]; 'mariek@utetribe.com' [mariek@utetribe.com]; 'marc.mansfield@usu.edu' [marc.mansfield@usu.edu]; mberger@utah.gov; 'mstewart@redleafinc.com' [mstewart@redleafinc.com]; Garvey, Megan [garvey.megan@epa.gov]; miken@utetribe.com; minnieg@utetribe.com; Morales, Monica [Morales.Monica@epa.gov]; 'rpage@ie-cos.com' [rpage@ie-cos.com]; 'rhrenko-browning@utahpetroleum.org' [rhrenko-browning@utahpetroleum.org]; 'Ryan.Clerico@enefit.com' [Ryan.Clerico@enefit.com]; 'Ryan@kairosaerospace.com' [Ryan@kairosaerospace.com]; 'Ryan.Swanson@epenergy.com' [Ryan.Swanson@epenergy.com]; 'scottchew@le.utah.gov' [scottchew@le.utah.gov]; Jackson, Scott [Jackson.Scott@epa.gov]; 'seth.lyman@usu.edu' [seth.lyman@usu.edu]; 'svance@utah.gov' [svance@utah.gov]; 'Spencer_Kimball@eogresources.com' [Spencer_Kimball@eogresources.com]; 'ssiffring@westernenergyalliance.org' [ssiffring@westernenergyalliance.org]; 'Thomas.H.Gibbons@andeavor.com' [Thomas.H.Gibbons@andeavor.com]; 'trang.tran@usu.edu' [trang.tran@usu.edu]; 'ttodd@utah.gov' [ttodd@utah.gov]; 'val.oman@epenergy.com' [val.oman@epenergy.com]; 'vince.christensen@simplot.com' [vince.christensen@simplot.com]; 'jmcqueen@crescentpointenergy.com' [jmcqueen@crescentpointenergy.com]; 'Andrea.Olsen@Simplot.com' [Andrea.Olsen@Simplot.com]; 'cpennell@utah.gov' [cpennell@utah.gov]; Nancy Daher [ndaher@utah.gov]; 'amatheson@utah.gov' [amatheson@utah.gov]; 'wesadams@utah.gov' [wesadams@utah.gov]; 'twiseman@utah.gov' [twiseman@utah.gov]; 'randy.hughes@middleforkep.com' [randy.hughes@middleforkep.com]; 'rob.zaback@middleforkep.com' [rob.zaback@middleforkep.com]
Subject: FW: EPA U&O Emission Reduction Credit Bank - Advance Notice of Proposed Rulemaking signed

Hi All,

Please see the email below that was forwarded for the group by Chris Dresser. We will pass on the full notice once it is published in the Federal Register, hopefully later this week.

Marie

Marie Bradshaw Durrant | Ray Quinney & Nebeker P.C. | 36 South State Street, Suite 1400 | Salt Lake City, Utah 84111
Direct: 801-323-3379 | Mobile: Ex. 6 Personal Privacy (PP) | Facsimile: 801-532-7543 | www.rqn.com

This email is from a law firm and may contain privileged or confidential information. Any unauthorized disclosure, distribution, or other use of this email and its contents is prohibited. If you are not the intended recipient, please contact the sender and delete this email. Thank you.

From: Dresser, Chris [mailto:Dresser.Chris@epa.gov]
Sent: Monday, May 20, 2019 12:58 PM
To: Marie Bradshaw Durrant
Subject: U&O Emission Reduction Credit Bank - Advance Notice of Proposed Rulemaking signed

Marie, can you circulate this with the Uinta Basin ozone workgroup?

****

On May 18, 2019, the Region 8 Administrator signed an Advance Notice of Proposed Rulemaking (ANPRM) soliciting broad feedback on different possible approaches to establishing a voluntary emission reduction credit (ERC) bank for ozone precursors, specifically volatile organic compounds (VOCs) and nitrogen oxides (NO_x), as part of a Clean Air Act (CAA) Federal Implementation Plan (FIP) applicable to stationary sources on Indian country lands within the Uintah and Ouray Indian Reservation. Allowing sources to use an EPA-run bank to voluntarily account for reductions that are quantifiable, enforceable, permanent and surplus of CAA requirements would serve several purposes. First, the creation of a system to bank credits for sale or for later use in permitting new or modified major sources could provide incentive for sources to implement controls on existing operations, which would lead to emission reductions sooner than would otherwise occur. Second, allowing the banking of emissions credits would facilitate continued development by providing a supply of compensating emissions reductions and offsets. At the Marginal level of ozone nonattainment, offsets for permitting new or modified major sources could be purchased and used at a ratio of 1.1 ton of reductions to every 1 ton of new emissions added to the Basin. This will ensure a declining emissions trend, while still allowing new development. Third, future actions taken by federal agencies (after August 3, 2019) exceeding a 100 tpy VOC threshold level could require offsets to satisfy CAA general conformity requirements. Creating a bank could also facilitate the creation and trading of those offsets.

The notice will likely be published in the Federal Register later this week, which will begin a 45-day comment period – the EPA will circulate a link with the workgroup once that happens. Please contact Chris Dresser at dresser.chris@epa.gov or 303-312-6385 with any questions.

Chris Dresser
U.S. EPA – Region 8
1595 Wynkoop Street
Denver, Colorado 80202-1129
Phone: (303) 312-6385

Appointment

From: Marie Bradshaw Durrant [MBDurrant@rqn.com]
Sent: 5/15/2019 11:31:08 PM
To: 'aaverett@sunrise-eng.com' [aaverett@sunrise-eng.com]; 'Adrienne.Sandoval@andeavor.com' [Adrienne.Sandoval@andeavor.com]; 'amyc@utetribe.com' [amyc@utetribe.com]; 'Angela.Zivkovich@anadarko.com' [Angela.Zivkovich@anadarko.com]; 'ashley@publiclandsolutions.org' [ashley@publiclandsolutions.org]; 'bstringer@uintah.utah.gov' [bstringer@uintah.utah.gov]; 'Rhammer@SLRconsulting.com' [Rhammer@SLRconsulting.com]; 'bmensinger@trinityconsultants.com' [bmensinger@trinityconsultants.com]; 'Chad.Schlichtemeier@anadarko.com' [Chad.Schlichtemeier@anadarko.com]; 'chelsea.cantrelle@epenergy.com' [chelsea.cantrelle@epenergy.com]; 'CColclasure@bwenergylaw.com' [CColclasure@bwenergylaw.com]; Dresser, Chris [Dresser.Chris@epa.gov]; Beeler, Cindy [Beeler.Cindy@epa.gov]; Smith, Claudia [Smith.Claudia@epa.gov]; Bean, Clayton [bean.clayton@epa.gov]; 'corey.jones@epenergy.com' [corey.jones@epenergy.com]; 'Daniel.D.Pring@andeavor.com' [Daniel.D.Pring@andeavor.com]; 'dbrown@tricountyhealth.com' [dbrown@tricountyhealth.com]; 'dmcneill@utah.gov' [dmcneill@utah.gov]; 'debbie@breatheutah.org' [debbie@breatheutah.org]; 'Douglas.Jordan@encana.com' [Douglas.Jordan@encana.com]; 'Eoman@altamontenergy.com' [Eoman@altamontenergy.com]; 'eehrmantraut@SLRconsulting.com' [eehrmantraut@SLRconsulting.com]; 'evernon@blm.gov' [evernon@blm.gov]; 'gtodd@duchesne.utah.gov' [gtodd@duchesne.utah.gov]; 'huy.tran@usu.edu' [huy.tran@usu.edu]; 'jpatterson@ndnlaw.com' [jpatterson@ndnlaw.com]; 'James.woodall@encana.com' [James.woodall@encana.com]; 'jwoodland@crescentpointenergy.com' [jwoodland@crescentpointenergy.com]; 'Jean.semborski@cop.com' [Jean.semborski@cop.com]; 'joe.sager@epenergy.com' [joe.sager@epenergy.com]; 'John.Spencer@simplot.com' [John.Spencer@simplot.com]; Ex. 6 Personal Privacy (PP) 'jmathis@tricountyhealth.com' [jmathis@tricountyhealth.com]; 'Jhirschi@enervest.net' [Jhirschi@enervest.net]; 'Karen_Pratt@xtoenergy.com' [Karen_Pratt@xtoenergy.com]; 'kburdick@Duchesne.utah.gov' [kburdick@Duchesne.utah.gov]; 'Lolsen@altamontenergy.com' [Lolsen@altamontenergy.com]; Lexie Wilson [lexiewilson@utah.gov]; 'lonnief@utetribe.com' [lonnief@utetribe.com]; 'mariek@utetribe.com' [mariek@utetribe.com]; 'marc.mansfield@usu.edu' [marc.mansfield@usu.edu]; mberger@utah.gov; 'mstewart@redleafinc.com' [mstewart@redleafinc.com]; Garvey, Megan [garvey.megan@epa.gov]; miken@utetribe.com; minnieg@utetribe.com; Morales, Monica [Morales.Monica@epa.gov]; 'rpage@ie-cos.com' [rpage@ie-cos.com]; 'rhrenko-browning@utahpetroleum.org' [rhrenko-browning@utahpetroleum.org]; 'Ryan.Clerico@enefit.com' [Ryan.Clerico@enefit.com]; 'Ryan@kairosaerospace.com' [Ryan@kairosaerospace.com]; 'Ryan.Swanson@epenergy.com' [Ryan.Swanson@epenergy.com]; 'scottchew@le.utah.gov' [scottchew@le.utah.gov]; Jackson, Scott [Jackson.Scott@epa.gov]; 'seth.lyman@usu.edu' [seth.lyman@usu.edu]; 'svance@utah.gov' [svance@utah.gov]; 'Spencer_Kimball@eogresources.com' [Spencer_Kimball@eogresources.com]; 'ssiffring@westernenergyalliance.org' [ssiffring@westernenergyalliance.org]; 'Thomas.H.Gibbons@andeavor.com' [Thomas.H.Gibbons@andeavor.com]; 'trang.tran@usu.edu' [trang.tran@usu.edu]; 'ttodd@utah.gov' [ttodd@utah.gov]; 'val.oman@epenergy.com' [val.oman@epenergy.com]; 'vince.christensen@simplot.com' [vince.christensen@simplot.com]; 'jmcqueen@crescentpointenergy.com' [jmcqueen@crescentpointenergy.com]; 'Andrea.Olsen@Simplot.com' [Andrea.Olsen@Simplot.com]; 'cpennell@utah.gov' [cpennell@utah.gov]; Nancy Daher [ndaher@utah.gov]; 'amatheson@utah.gov' [amatheson@utah.gov]; 'wesadams@utah.gov' [wesadams@utah.gov]; 'twiseman@utah.gov' [twiseman@utah.gov]; 'randy.hughes@middleforkep.com' [randy.hughes@middleforkep.com]; 'rob.zaback@middleforkep.com' [rob.zaback@middleforkep.com]

Subject: Uinta Basin Ozone Working Group Meeting
Location: Vernal, Salt Lake City, Denver

Start: 6/12/2019 8:00:00 PM
End: 6/12/2019 9:00:00 PM
Show Time As: Tentative

Recurrence: (none)

Message

From: Greg Schrab [gschrab@sm-energy.com]
Sent: 5/9/2019 6:28:36 PM
To: Garvey, Megan [garvey.megan@epa.gov]
CC: Siffring, Stuart [ssiffring@westernenergyalliance.org]
Subject: RE: Withdrawal of Finding of Substantial Inadequacy of Implementation Plan and of Call for Texas State Implementation Plan Revision-Affirmative Defense Provisions
Attachments: ATT00001.txt

Thanks Megan, and great to see you too!

Thanks,

Greg

Greg Schrab, CHMM, CSP
Corporate EH&S Manager

1775 Sherman Street
Suite 1200
Denver, CO 80203
Office: (303) 864-2567
Cell: Ex. 6 Personal Privacy (PP)
gschrab@sm-energy.com

From: Garvey, Megan <garvey.megan@epa.gov>
Sent: Thursday, May 9, 2019 12:23 PM
To: Greg Schrab <gschrab@sm-energy.com>
Cc: Siffring, Stuart <ssiffring@westernenergyalliance.org>
Subject: RE: Withdrawal of Finding of Substantial Inadequacy of Implementation Plan and of Call for Texas State Implementation Plan Revision-Affirmative Defense Provisions

WARNING: This email originated from outside of SM Energy. Do not click links or open attachments unless you recognize the sender and are expecting the content and know it is safe.

Thanks, Greg.

Stuart and Greg:

The invitation for feedback on the New Owner Audit Program is on page 6 of the Implementation Considerations document (also referred to as the Oil and Gas New Owner Program Questions and Answers):

https://www.epa.gov/sites/production/files/2019-03/documents/ognewownerprogramquestionsandanswers032919.pdf

The EPA is Providing Participating New Owners with Additional Operational Flexibility for Completing Appendix B

For up to one year following the Agreement's effective date, a New Owner may propose equivalent engineering, design, and/or operational measures in lieu of those specified in Appendix B. The proposed measures shall demonstrate that:

1. vapor control system pressures will not exceed the applicable leak points during normal operations;
2. vapor control systems achieve stated control efficiencies during normal operations; and
3. compromised equipment is detected and repaired or replaced.

Thanks and nice to see you both! Megan

Megan E. Garvey
Senior Advisor for Oil and Gas, Regional Management and State Affairs
Office of the Administrator
U.S. Environmental Protection Agency
Work: 303.312.6192 | Cell: Ex. 6 Personal Privacy (PP)

From: Greg Schrab <gschrab@sm-energy.com>
Sent: Thursday, May 9, 2019 12:14 PM
To: Garvey, Megan <garvey.megan@epa.gov>
Cc: Siffring, Stuart <ssiffring@westernenergyalliance.org>
Subject: Withdrawal of Finding of Substantial Inadequacy of Implementation Plan and of Call for Texas State Implementation Plan Revision-Affirmative Defense Provisions

Megan,

Here's the FR notice on the Region 6 on AD in the TX SIP for excess emissions.

Thanks,

Greg

https://www.federalregister.gov/documents/2019/04/29/2019-08480/withdrawal-of-finding-of-substantial-inadequacy-of-implementation-plan-and-of-call-for-texas-state?utm_campaign=subscription%20mailing%20list&utm_source=federalregister.gov&utm_medium=email

SUMMARY:

The Environmental Protection Agency (EPA) Region 6 Regional Administrator is considering an alternative interpretation regarding affirmative defense provisions in State Implementation Plans (SIPs) of states in EPA Region 6 that departs from the EPA's 2015 policy on this subject. In accordance with the Federal Clean Air Act (Act or CAA), the EPA Region 6 is proposing to make a finding that the affirmative defense provisions in the SIP for the state of Texas applicable to excess emissions that occur during certain upset events and unplanned maintenance, startup, or shutdown activities are narrowly tailored and limited to ensure protection of the National Ambient Air Quality Standards (NAAQS) and other CAA requirements, and would be consistent with the newly announced

alternative interpretation if adopted. Accordingly, the EPA Region 6 also is proposing to withdraw the SIP call issued to Texas that was published on June 12, 2015.

DATES:

Comments must be received on or before June 28, 2019.

Greg Schrab, CHMM, CSP
Corporate EH&S Manager
[redacted]
1775 Sherman Street
Suite 1200
Denver, CO 80203
Office: (303) 864-2567
Cell: Ex. 6 Personal Privacy (PP)
gschrab@sm-energy.com

Appointment

From: Marie Bradshaw Durrant [MBDurrant@rqn.com]
Sent: 4/11/2019 3:29:30 PM
To: 'Adrienne.Sandoval@andeavor.com' [Adrienne.Sandoval@andeavor.com]; 'Andrea.Olsen@Simplot.com' [Andrea.Olsen@Simplot.com]; 'Angela.Zivkovich@anadarko.com' [Angela.Zivkovich@anadarko.com]; Beeler, Cindy [Beeler.Cindy@epa.gov]; 'CColclasure@bwenergylaw.com' [CColclasure@bwenergylaw.com]; 'Chad.Schlichtemeier@anadarko.com' [Chad.Schlichtemeier@anadarko.com]; 'Daniel.D.Pring@andeavor.com' [Daniel.D.Pring@andeavor.com]; 'Djordan@newfield.com' [Djordan@newfield.com]; Dresser, Chris [Dresser.Chris@epa.gov]; 'Eoman@altamontenergy.com' [Eoman@altamontenergy.com]; 'James.woodall@encana.com' [James.woodall@encana.com]; 'Jean.semborski@cop.com' [Jean.semborski@cop.com]; 'Jhirschi@enervest.net' [Jhirschi@enervest.net]; 'John.Spencer@simplot.com' [John.Spencer@simplot.com]; 'Karen_Pratt@xtoenergy.com' [Karen_Pratt@xtoenergy.com]; 'Lolsen@altamontenergy.com' [Lolsen@altamontenergy.com]; 'Rhammer@SLRconsulting.com' [Rhammer@SLRconsulting.com]; 'Ryan.Clerico@enefit.com' [Ryan.Clerico@enefit.com]; 'Ryan.Swanson@epenergy.com' [Ryan.Swanson@epenergy.com]; 'Ryan@kairosaerospace.com' [Ryan@kairosaerospace.com]; 'Spencer_Kimball@eogresources.com' [Spencer_Kimball@eogresources.com]; 'Thomas.H.Gibbons@andeavor.com' [Thomas.H.Gibbons@andeavor.com]; 'aaverett@sunrise-eng.com' [aaverett@sunrise-eng.com]; 'amatheson@utah.gov' [amatheson@utah.gov]; 'amyc@utetribe.com' [amyc@utetribe.com]; 'ashley@publiclandsolutions.org' [ashley@publiclandsolutions.org]; Bean, Clayton [bean.clayton@epa.gov]; 'bmensinger@trinityconsultants.com' [bmensinger@trinityconsultants.com]; 'bstringer@uintah.utah.gov' [bstringer@uintah.utah.gov]; 'chelsea.cantrelle@epenergy.com' [chelsea.cantrelle@epenergy.com]; 'corey.jones@epenergy.com' [corey.jones@epenergy.com]; 'cpennell@utah.gov' [cpennell@utah.gov]; 'dbrown@tricountyhealth.com' [dbrown@tricountyhealth.com]; 'debbie@breatheutah.org' [debbie@breatheutah.org]; 'dmcneill@utah.gov' [dmcneill@utah.gov]; 'eehrmantraut@SLRconsulting.com' [eehrmantraut@SLRconsulting.com]; 'evernon@blm.gov' [evernon@blm.gov]; Garvey, Megan [garvey.megan@epa.gov]; 'gtodd@duchesne.utah.gov' [gtodd@duchesne.utah.gov]; 'huy.tran@usu.edu' [huy.tran@usu.edu]; Jackson, Scott [Jackson.Scott@epa.gov]; 'jmathis@tricountyhealth.com' [jmathis@tricountyhealth.com]; 'jmcqueen@crescentpointenergy.com' [jmcqueen@crescentpointenergy.com]; Ex. 6 Personal Privacy (PP) 'joe.sager@epenergy.com' [joe.sager@epenergy.com]; 'jpatterson@ndnlaw.com' [jpatterson@ndnlaw.com]; 'jwoodland@crescentpointenergy.com' [jwoodland@crescentpointenergy.com]; 'kburdick@Duchesne.utah.gov' [kburdick@Duchesne.utah.gov]; Lexie Wilson [lexiewilson@utah.gov]; 'lonnief@utetribe.com' [lonnief@utetribe.com]; 'marc.mansfield@usu.edu' [marc.mansfield@usu.edu]; 'mariek@utetribe.com' [mariek@utetribe.com]; mberger@utah.gov; miken@utetribe.com; minnieg@utetribe.com; Morales, Monica [Morales.Monica@epa.gov]; 'mstewart@redleafinc.com' [mstewart@redleafinc.com]; Nancy Daher [ndaher@utah.gov]; 'rhrenko-browning@utahpetroleum.org' [rhrenko-browning@utahpetroleum.org]; 'rpage@ie-cos.com' [rpage@ie-cos.com]; 'scottchew@le.utah.gov' [scottchew@le.utah.gov]; 'seth.lyman@usu.edu' [seth.lyman@usu.edu]; Smith, Claudia [Smith.Claudia@epa.gov]; 'ssiffring@westernenergyalliance.org' [ssiffring@westernenergyalliance.org]; 'svance@utah.gov' [svance@utah.gov]; 'trang.tran@usu.edu' [trang.tran@usu.edu]; 'ttodd@utah.gov' [ttodd@utah.gov]; 'twiseman@utah.gov' [twiseman@utah.gov]; 'val.oman@epenergy.com' [val.oman@epenergy.com]; 'vince.christensen@simplot.com' [vince.christensen@simplot.com]; 'wesadams@utah.gov' [wesadams@utah.gov]; 'woswald@utah.gov' [woswald@utah.gov]
CC: 'Douglas.Jordan@encana.com' [Douglas.Jordan@encana.com]; Singh, Amrita [singh.amrita@epa.gov]; Tonnesen, Gail [Tonnesen.Gail@epa.gov]; 'irene@uintabasin.org' [irene@uintabasin.org]; Yamartino, Jillian [Jillian.Yamartino@anadarko.com]

Subject: Uinta Basin Ozone Working Group Meeting - agenda and video/call-in information
Location: Crossroads Community Center 50 E 200 S, Roosevelt, UT 84066

Start: 4/11/2019 8:30:00 PM
End: 4/11/2019 10:30:00 PM
Show Time As: Tentative

Recurrence: (none)

Please see the attached agenda for the April 11 OBOWG meeting.

Call-in and video conferencing information:

RQN is inviting you to a scheduled Zoom meeting.

Topic: April 2019 Uinta Basin Ozone Working Group Meeting

Time: Apr 11, 2019 2:15 PM Mountain Time (US and Canada)

Join Zoom Meeting

Ex. 6 Personal Privacy (PP)

One tap mobile

Ex. 6 Personal Privacy (PP) US (New York) US

Dial by your location

Ex. 6 Personal Privacy (PP) US (New York) US

Meeting ID: Ex. 6 Personal Privacy (PP)

Find your local number: https://zoom.us/u/acWfpJi35E

This meeting will be between events for the Utah Division of Oil Gas and Mining Hydrocarbon Conference Ex. 6 Personal Privacy (PP) and the Utah Petroleum Association roundtable and community outreach dinner.

If you plan to attend the Utah Petroleum Association dinner, please sign up at the following link: https://utahpetroleum.org/ub-community-outreach/.

Message

From: Seth Lyman [seth.lyman@usu.edu]
Sent: 4/8/2019 8:49:31 PM
To: Marie Bradshaw Durrant [MBDurrant@rqn.com]; 'svance@utah.gov' [svance@utah.gov]; 'corey.jones@epenergy.com' [corey.jones@epenergy.com]; 'Rhammer@SLRconsulting.com' [Rhammer@SLRconsulting.com]; Nancy Daher [ndaher@utah.gov]; Huy Tran [huy.tran@usu.edu]; 'twiseman@utah.gov' [twiseman@utah.gov]; 'James.woodall@encana.com' [James.woodall@encana.com]; 'vince.christensen@simplot.com' [vince.christensen@simplot.com]; 'ttodd@utah.gov' [ttodd@utah.gov]; Beeler, Cindy [Beeler.Cindy@epa.gov]; 'gtodd@duchesne.utah.gov' [gtodd@duchesne.utah.gov]; 'amyc@utetribe.com' [amyc@utetribe.com]; 'Ryan.Swanson@epenergy.com' [Ryan.Swanson@epenergy.com]; 'debbie@breatheutah.org' [debbie@breatheutah.org]; miken@utetribe.com; 'CColclasure@bwenergylaw.com' [CColclasure@bwenergylaw.com]; 'rhrenko-browning@utahpetroleum.org' [rhrenko-browning@utahpetroleum.org]; Bean, Clayton [bean.clayton@epa.gov]; mberger@utah.gov; 'aaverett@sunrise-eng.com' [aaverett@sunrise-eng.com]; 'Ryan@kairosaerospace.com' [Ryan@kairosaerospace.com]; 'lonnief@utetribe.com' [lonnief@utetribe.com] **Ex. 6 Personal Privacy (PP)** 'Djordan@newfield.com' [Djordan@newfield.com]; Dresser, Chris [Dresser.Chris@epa.gov]; 'jpatterson@ndnlaw.com' [jpatterson@ndnlaw.com]; 'Jhirschi@enervest.net' [Jhirschi@enervest.net]; 'chelsea.cantrelle@epenergy.com' [chelsea.cantrelle@epenergy.com]; Morales, Monica [Morales.Monica@epa.gov]; 'Chad.Schlichtemeier@anadarko.com' [Chad.Schlichtemeier@anadarko.com]; 'Adrienne.Sandoval@andeavor.com' [Adrienne.Sandoval@andeavor.com]; 'kburdick@Duchesne.utah.gov' [kburdick@Duchesne.utah.gov]; 'joe.sager@epenergy.com' [joe.sager@epenergy.com]; 'ssiffring@westernenergyalliance.org' [ssiffring@westernenergyalliance.org]; 'Karen_Pratt@xtoenergy.com' [Karen_Pratt@xtoenergy.com]; 'mariek@utetribe.com' [mariek@utetribe.com]; 'jmathis@tricountyhealth.com' [jmathis@tricountyhealth.com]; Marc Mansfield [marc.mansfield@usu.edu]; 'Lolsen@altamontenergy.com' [Lolsen@altamontenergy.com]; 'jmcqueen@crescentpointenergy.com' [jmcqueen@crescentpointenergy.com]; 'John.Spencer@simplot.com' [John.Spencer@simplot.com]; Lexie Wilson [lexiewilson@utah.gov]; 'evernon@blm.gov' [evernon@blm.gov]; Smith, Claudia [Smith.Claudia@epa.gov]; 'eehrmantraut@SLRconsulting.com' [eehrmantraut@SLRconsulting.com]; 'wesadams@utah.gov' [wesadams@utah.gov]; 'amatheson@utah.gov' [amatheson@utah.gov]; 'Angela.Zivkovich@anadarko.com' [Angela.Zivkovich@anadarko.com]; 'Spencer_Kimball@eogresources.com' [Spencer_Kimball@eogresources.com]; 'ashley@publiclandsolutions.org' [ashley@publiclandsolutions.org]; 'dbrown@tricountyhealth.com' [dbrown@tricountyhealth.com]; Jackson, Scott [Jackson.Scott@epa.gov]; 'scottchew@le.utah.gov' [scottchew@le.utah.gov]; Garvey, Megan [garvey.megan@epa.gov]; 'Daniel.D.Pring@andeavor.com' [Daniel.D.Pring@andeavor.com]; minnieg@utetribe.com; 'cpennell@utah.gov' [cpennell@utah.gov]; 'woswald@utah.gov' [woswald@utah.gov]; 'bstringer@uintah.utah.gov' [bstringer@uintah.utah.gov]; 'bmensinger@trinityconsultants.com' [bmensinger@trinityconsultants.com]; 'jwoodland@crescentpointenergy.com' [jwoodland@crescentpointenergy.com]; 'Ryan.Clerico@enefit.com' [Ryan.Clerico@enefit.com]; 'mstewart@redleafinc.com' [mstewart@redleafinc.com]; 'Jean.semborski@cop.com' [Jean.semborski@cop.com]; Trang Tran [trang.tran@usu.edu]; 'val.oman@epenergy.com' [val.oman@epenergy.com]; 'rpage@ie-cos.com' [rpage@ie-cos.com]; 'Thomas.H.Gibbons@andeavor.com' [Thomas.H.Gibbons@andeavor.com]; 'dmcneill@utah.gov' [dmcneill@utah.gov]; 'Andrea.Olsen@Simplot.com' [Andrea.Olsen@Simplot.com]; 'Eoman@altamontenergy.com' [Eoman@altamontenergy.com]
CC: Tonnesen, Gail [Tonnesen.Gail@epa.gov]; 'irene@uintabasin.org' [irene@uintabasin.org]; 'Douglas.Jordan@encana.com' [Douglas.Jordan@encana.com]; Doris Vanden Akker [dvandenakker@RQN.COM]
Subject: RE: Uinta Basin Ozone Working Group Meeting - agenda and video/call-in information

Also, just to be clear, USU will NOT be broadcasting the ozone working group meeting in Vernal this time because we will all be at the meeting in person in Roosevelt, so if you show up at our campus in Vernal you will be lonely. Thanks. - Seth

---

From: Marie Bradshaw Durrant <MBDurrant@rqn.com>
Sent: Monday, April 08, 2019 1:31 PM
To: 'svance@utah.gov' <svance@utah.gov>; 'corey.jones@epenergy.com' <corey.jones@epenergy.com>; 'Rhammer@SLRconsulting.com' <Rhammer@SLRconsulting.com>; 'ndaher@utah.gov' <ndaher@utah.gov>; Huy Tran <huy.tran@usu.edu>; 'twiseman@utah.gov' <twiseman@utah.gov>; 'James.woodall@encana.com'

<James.woodall@encana.com>; 'vince.christensen@simplot.com' <vince.christensen@simplot.com>; 'ttodd@utah.gov' <ttodd@utah.gov>; 'Beeler.Cindy@epa.gov' <Beeler.Cindy@epa.gov>; 'gtodd@duchesne.utah.gov' <gtodd@duchesne.utah.gov>; 'amyc@utetribe.com' <amyc@utetribe.com>; 'Ryan.Swanson@epenergy.com' <Ryan.Swanson@epenergy.com>; 'debbie@breatheutah.org' <debbie@breatheutah.org>; 'miken@utetribe.com' <miken@utetribe.com>; 'CColclasure@bwenergylaw.com' <CColclasure@bwenergylaw.com>; 'rhrenko-browning@utahpetroleum.org' <rhrenko-browning@utahpetroleum.org>; 'bean.clayton@epa.gov' <bean.clayton@epa.gov>; 'mberger@utah.gov' <mberger@utah.gov>; 'aaverett@sunrise-eng.com' <aaverett@sunrise-eng.com>; 'Ryan@kairosaerospace.com' <Ryan@kairosaerospace.com>; 'lonnief@utetribe.com' <lonnief@utetribe.com>; Ex. 6 Personal Privacy (PP) ; 'Djordan@newfield.com' <Djordan@newfield.com>; 'Dresser.Chris@epa.gov' <Dresser.Chris@epa.gov>; 'jpatterson@ndnlaw.com' <jpatterson@ndnlaw.com>; 'Jhirschi@enervest.net' <Jhirschi@enervest.net>; 'chelsea.cantrelle@epenergy.com' <chelsea.cantrelle@epenergy.com>; 'morales.monica@epa.gov' <morales.monica@epa.gov>; 'Chad.Schlichtemeier@anadarko.com' <Chad.Schlichtemeier@anadarko.com>; 'Adrienne.Sandoval@andeavor.com' <Adrienne.Sandoval@andeavor.com>; 'kburdick@Duchesne.utah.gov' <kburdick@Duchesne.utah.gov>; 'joe.sager@epenergy.com' <joe.sager@epenergy.com>; 'ssiffring@westernenergyalliance.org' <ssiffring@westernenergyalliance.org>; 'Karen_Pratt@xtoenergy.com' <Karen_Pratt@xtoenergy.com>; 'mariek@utetribe.com' <mariek@utetribe.com>; 'jmathis@tricountyhealth.com' <jmathis@tricountyhealth.com>; Marc Mansfield <marc.mansfield@usu.edu>; 'Lolsen@altamontenergy.com' <Lolsen@altamontenergy.com>; 'jmcqueen@crescentpointenergy.com' <jmcqueen@crescentpointenergy.com>; 'John.Spencer@simplot.com' <John.Spencer@simplot.com>; 'lexiewilson@utah.gov' <lexiewilson@utah.gov>; 'evernon@blm.gov' <evernon@blm.gov>; 'smith.claudia@epa.gov' <smith.claudia@epa.gov>; 'eehrmantraut@SLRconsulting.com' <eehrmantraut@SLRconsulting.com>; 'wesadams@utah.gov' <wesadams@utah.gov>; 'amatheson@utah.gov' <amatheson@utah.gov>; 'Angela.Zivkovich@anadarko.com' <Angela.Zivkovich@anadarko.com>; 'Spencer_Kimball@eogresources.com' <Spencer_Kimball@eogresources.com>; 'ashley@publiclandsolutions.org' <ashley@publiclandsolutions.org>; 'dbrown@tricountyhealth.com' <dbrown@tricountyhealth.com>; 'jackson.scott@epa.gov' <jackson.scott@epa.gov>; 'scottchew@le.utah.gov' <scottchew@le.utah.gov>; 'garvey.megan@epa.gov' <garvey.megan@epa.gov>; 'Daniel.D.Pring@andeavor.com' <Daniel.D.Pring@andeavor.com>; Seth Lyman <seth.lyman@usu.edu>; 'minnieg@utetribe.com' <minnieg@utetribe.com>; 'cpennell@utah.gov' <cpennell@utah.gov>; 'woswald@utah.gov' <woswald@utah.gov>; 'bstringer@uintah.utah.gov' <bstringer@uintah.utah.gov>; 'bmensinger@trinityconsultants.com' <bmensinger@trinityconsultants.com>; 'jwoodland@crescentpointenergy.com' <jwoodland@crescentpointenergy.com>; 'Ryan.Clerico@enefit.com' <Ryan.Clerico@enefit.com>; 'mstewart@redleafinc.com' <mstewart@redleafinc.com>; 'Jean.semborski@cop.com' <Jean.semborski@cop.com>; Trang Tran <trang.tran@usu.edu>; 'val.oman@epenergy.com' <val.oman@epenergy.com>; 'rpage@ie-cos.com' <rpage@ie-cos.com>; 'Thomas.H.Gibbons@andeavor.com' <Thomas.H.Gibbons@andeavor.com>; 'dmcneill@utah.gov' <dmcneill@utah.gov>; 'Andrea.Olsen@Simplot.com' <Andrea.Olsen@Simplot.com>; 'Eoman@altamontenergy.com' <Eoman@altamontenergy.com>
Cc: 'Tonnesen, Gail' <Tonnesen.Gail@epa.gov>; 'irene@uintabasin.org' <irene@uintabasin.org>; 'Douglas.Jordan@encana.com' <Douglas.Jordan@encana.com>; Doris Vanden Akker <dvandenakker@RQN.COM>
Subject: RE: Uinta Basin Ozone Working Group Meeting - agenda and video/call-in information

Below is the video/call-in information for Thursday's meeting. The agenda is attached. We hope to see most of you there in person!

Marie

RQN is inviting you to a scheduled Zoom meeting.

Topic: April 2019 Uinta Basin Ozone Working Group Meeting
Time: Apr 11, 2019 2:15 PM Mountain Time (US and Canada)

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Find your local number: https://zoom.us/u/acWfpJi35E

Marie Bradshaw Durrant | Ray Quinney & Nebeker P.C. | 36 South State Street, Suite 1400 | Salt Lake City, Utah 84111
Direct: 801-323-3379 | Mobile: Ex. 6 Personal Privacy (PP) | Facsimile: 801-532-7543 | www.rqn.com

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-----Original Appointment-----
From: Marie Bradshaw Durrant
Sent: Sunday, March 17, 2019 3:43 PM
To: Marie Bradshaw Durrant; 'svance@utah.gov'; 'corey.jones@epenergy.com'; 'Rhammer@SLRconsulting.com'; 'ndaher@utah.gov'; 'huy.tran@usu.edu'; 'twiseman@utah.gov'; 'James.woodall@encana.com'; 'vince.christensen@simplot.com'; 'ttodd@utah.gov'; 'Beeler.Cindy@epa.gov'; 'gtodd@duchesne.utah.gov'; 'amyc@utetribe.com'; 'Ryan.Swanson@epenergy.com'; 'debbie@breatheutah.org'; 'miken@utetribe.com'; 'CColclasure@bwenergylaw.com'; 'rhrenko-browning@utahpetroleum.org'; 'bean.clayton@epa.gov'; 'mberger@utah.gov'; 'aaverett@sunrise-eng.com'; 'Ryan@kairosaerospace.com'; 'lonnief@utetribe.com'; Ex. 6 Personal Privacy (PP) 'Djordan@newfield.com'; 'Dresser.Chris@epa.gov'; 'jpatterson@ndnlaw.com'; 'Jhirschi@enervest.net'; 'chelsea.cantrelle@epenergy.com'; 'morales.monica@epa.gov'; 'Chad.Schlichtemeier@anadarko.com'; 'Adrienne.Sandoval@andeavor.com'; 'kburdick@Duchesne.utah.gov'; 'joe.sager@epenergy.com'; 'ssiffring@westernenergyalliance.org'; 'Karen_Pratt@xtoenergy.com'; 'mariek@utetribe.com'; 'jmathis@tricountyhealth.com'; 'marc.mansfield@usu.edu'; 'Lolsen@altamontenergy.com'; 'jmcqueen@crescentpointenergy.com'; 'John.Spencer@simplot.com'; 'lexiewilson@utah.gov'; 'evernon@blm.gov'; 'smith.claudia@epa.gov'; 'eehrmantraut@SLRconsulting.com'; 'wesadams@utah.gov'; 'amatheson@utah.gov'; 'Angela.Zivkovich@anadarko.com'; 'Spencer_Kimball@eogresources.com'; 'ashley@publiclandsolutions.org'; 'dbrown@tricountyhealth.com'; 'jackson.scott@epa.gov'; 'scottchew@le.utah.gov'; 'garvey.megan@epa.gov'; 'Daniel.D.Pring@andeavor.com'; 'seth.lyman@usu.edu'; 'minnieg@utetribe.com'; 'cpennell@utah.gov'; 'woswald@utah.gov'; 'bstringer@uintah.utah.gov'; 'bmensinger@trinityconsultants.com'; 'jwoodland@crescentpointenergy.com'; 'Ryan.Clerico@enefit.com'; 'mstewart@redleafinc.com'; 'Jean.semborski@cop.com'; 'trang.tran@usu.edu'; 'val.oman@epenergy.com'; 'rpage@ie-cos.com'; 'Thomas.H.Gibbons@andeavor.com'; 'dmcneill@utah.gov'; 'Andrea.Olsen@Simplot.com'; 'Eoman@altamontenergy.com'
Cc: 'Tonnesen, Gail'; 'irene@uintabasin.org'; 'Douglas.Jordan@encana.com'
Subject: Uinta Basin Ozone Working Group Meeting - agenda and video/call-in information
When: Thursday, April 11, 2019 2:30 PM-4:30 PM (UTC-07:00) Mountain Time (US & Canada).
Where: Crossroads Community Center 50 E 200 S, Roosevelt, UT 84066

Please see the attached agenda for the April 11 OBOWG meeting.

Call-in and video conferencing information:

RQN is inviting you to a scheduled Zoom meeting.

Topic: April 2019 Uinta Basin Ozone Working Group Meeting
Time: Apr 11, 2019 2:15 PM Mountain Time (US and Canada)

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This meeting will be between events for the Utah Division of Oil Gas and Mining Hydrocarbon Conference Ex. 6 Personal Privacy (PP) and the Utah Petroleum Association roundtable and community outreach dinner.

If you plan to attend the Utah Petroleum Association dinner, please sign up at the following link: https://utahpetroleum.org/ub-community-outreach/. << File: 2019 0411 Uinta Basin Ozone Working Group Meeting Agenda.docx >>

Message

From: Marie Bradshaw Durrant [MBDurrant@rqn.com]
Sent: 4/8/2019 7:30:38 PM
To: 'svance@utah.gov' [svance@utah.gov]; 'corey.jones@epenergy.com' [corey.jones@epenergy.com]; 'Rhammer@SLRconsulting.com' [Rhammer@SLRconsulting.com]; Nancy Daher [ndaher@utah.gov]; 'huy.tran@usu.edu' [huy.tran@usu.edu]; 'twiseman@utah.gov' [twiseman@utah.gov]; 'James.woodall@encana.com' [James.woodall@encana.com]; 'vince.christensen@simplot.com' [vince.christensen@simplot.com]; 'ttodd@utah.gov' [ttodd@utah.gov]; Beeler, Cindy [Beeler.Cindy@epa.gov]; 'gtodd@duchesne.utah.gov' [gtodd@duchesne.utah.gov]; 'amyc@utetribe.com' [amyc@utetribe.com]; 'Ryan.Swanson@epenergy.com' [Ryan.Swanson@epenergy.com]; 'debbie@breatheutah.org' [debbie@breatheutah.org]; miken@utetribe.com; 'CColclasure@bwenergylaw.com' [CColclasure@bwenergylaw.com]; 'rhrenko-browning@utahpetroleum.org' [rhrenko-browning@utahpetroleum.org]; Bean, Clayton [bean.clayton@epa.gov]; mberger@utah.gov; 'aaverett@sunrise-eng.com' [aaverett@sunrise-eng.com]; 'Ryan@kairosaerospace.com' [Ryan@kairosaerospace.com]; 'lonnief@utetribe.com' [lonnief@utetribe.com]; Ex. 6 Personal Privacy (PP); 'Djordan@newfield.com' [Djordan@newfield.com]; Dresser, Chris [Dresser.Chris@epa.gov]; 'jpatterson@ndnlaw.com' [jpatterson@ndnlaw.com]; 'Jhirschi@enervest.net' [Jhirschi@enervest.net]; 'chelsea.cantrelle@epenergy.com' [chelsea.cantrelle@epenergy.com]; Morales, Monica [Morales.Monica@epa.gov]; 'Chad.Schlichtemeier@anadarko.com' [Chad.Schlichtemeier@anadarko.com]; 'Adrienne.Sandoval@andeavor.com' [Adrienne.Sandoval@andeavor.com]; 'kburdick@Duchesne.utah.gov' [kburdick@Duchesne.utah.gov]; 'joe.sager@epenergy.com' [joe.sager@epenergy.com]; 'ssiffring@westernenergyalliance.org' [ssiffring@westernenergyalliance.org]; 'Karen_Pratt@xtoenergy.com' [Karen_Pratt@xtoenergy.com]; 'mariek@utetribe.com' [mariek@utetribe.com]; 'jmathis@tricountyhealth.com' [jmathis@tricountyhealth.com]; 'marc.mansfield@usu.edu' [marc.mansfield@usu.edu]; 'Lolsen@altamontenergy.com' [Lolsen@altamontenergy.com]; 'jmcqueen@crescentpointenergy.com' [jmcqueen@crescentpointenergy.com]; 'John.Spencer@simplot.com' [John.Spencer@simplot.com]; Lexie Wilson [lexiewilson@utah.gov]; 'evernon@blm.gov' [evernon@blm.gov]; Smith, Claudia [Smith.Claudia@epa.gov]; 'eehrmantraut@SLRconsulting.com' [eehrmantraut@SLRconsulting.com]; 'wesadams@utah.gov' [wesadams@utah.gov]; 'amatheson@utah.gov' [amatheson@utah.gov]; 'Angela.Zivkovich@anadarko.com' [Angela.Zivkovich@anadarko.com]; 'Spencer_Kimball@eogresources.com' [Spencer_Kimball@eogresources.com]; 'ashley@publiclandsolutions.org' [ashley@publiclandsolutions.org]; 'dbrown@tricountyhealth.com' [dbrown@tricountyhealth.com]; Jackson, Scott [Jackson.Scott@epa.gov]; 'scottchew@le.utah.gov' [scottchew@le.utah.gov]; Garvey, Megan [garvey.megan@epa.gov]; 'Daniel.D.Pring@andeavor.com' [Daniel.D.Pring@andeavor.com]; 'seth.lyman@usu.edu' [seth.lyman@usu.edu]; minnieg@utetribe.com; 'cpennell@utah.gov' [cpennell@utah.gov]; 'woswald@utah.gov' [woswald@utah.gov]; 'bstringer@uintah.utah.gov' [bstringer@uintah.utah.gov]; 'bmensinger@trinityconsultants.com' [bmensinger@trinityconsultants.com]; 'jwoodland@crescentpointenergy.com' [jwoodland@crescentpointenergy.com]; 'Ryan.Clerico@enefit.com' [Ryan.Clerico@enefit.com]; 'mstewart@redleafinc.com' [mstewart@redleafinc.com]; 'Jean.semborski@cop.com' [Jean.semborski@cop.com]; 'trang.tran@usu.edu' [trang.tran@usu.edu]; 'val.oman@epenergy.com' [val.oman@epenergy.com]; 'rpage@ie-cos.com' [rpage@ie-cos.com]; 'Thomas.H.Gibbons@andeavor.com' [Thomas.H.Gibbons@andeavor.com]; 'dmcneill@utah.gov' [dmcneill@utah.gov]; 'Andrea.Olsen@Simplot.com' [Andrea.Olsen@Simplot.com]; 'Eoman@altamontenergy.com' [Eoman@altamontenergy.com]
CC: Tonnesen, Gail [Tonnesen.Gail@epa.gov]; 'irene@uintabasin.org' [irene@uintabasin.org]; 'Douglas.Jordan@encana.com' [Douglas.Jordan@encana.com]; Doris Vanden Akker [dvandenakker@RQN.COM]
Subject: RE: Uinta Basin Ozone Working Group Meeting - agenda and video/call-in information
Attachments: 2019 0411 Uinta Basin Ozone Working Group Meeting Agenda.docx

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Marie

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Time: Apr 11, 2019 2:15 PM Mountain Time (US and Canada)

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Cc: 'Tonnesen, Gail'; 'irene@uintabasin.org'; 'Douglas.Jordan@encana.com'
Subject: Uinta Basin Ozone Working Group Meeting - agenda and video/call-in information
When: Thursday, April 11, 2019 2:30 PM-4:30 PM (UTC-07:00) Mountain Time (US & Canada).
Where: Crossroads Community Center 50 E 200 S, Roosevelt, UT 84066

Please see the attached agenda for the April 11 OBOWG meeting.

Call-in and video conferencing information:

RQN is inviting you to a scheduled Zoom meeting.

Topic: April 2019 Uinta Basin Ozone Working Group Meeting
Time: Apr 11, 2019 2:15 PM Mountain Time (US and Canada)

Join Zoom Meeting
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US
Meeting ID: Ex. 6 Personal Privacy (PP)
Find your local number: https://zoom.us/u/acWfpJi35E

This meeting will be between events for the Utah Division of Oil Gas and Mining Hydrocarbon Conference Ex. 6 Personal Privacy (PP)) and the Utah Petroleum Association roundtable and community outreach dinner.

If you plan to attend the Utah Petroleum Association dinner, please sign up at the following link: https://utahpetroleum.org/ub-community-outreach/. << File: 2019 0411 Uinta Basin Ozone Working Group Meeting Agenda.docx >>

Appointment

From: Marie Bradshaw Durrant [MBDurrant@rqn.com]
Sent: 4/8/2019 7:28:32 PM
To: 'svance@utah.gov' [svance@utah.gov]; 'corey.jones@epenergy.com' [corey.jones@epenergy.com]; 'Rhammer@SLRconsulting.com' [Rhammer@SLRconsulting.com]; Nancy Daher [ndaher@utah.gov]; 'huy.tran@usu.edu' [huy.tran@usu.edu]; 'twiseman@utah.gov' [twiseman@utah.gov]; 'James.woodall@encana.com' [James.woodall@encana.com]; 'vince.christensen@simplot.com' [vince.christensen@simplot.com]; 'ttodd@utah.gov' [ttodd@utah.gov]; Beeler, Cindy [Beeler.Cindy@epa.gov]; 'gtodd@duchesne.utah.gov' [gtodd@duchesne.utah.gov]; 'amyc@utetribe.com' [amyc@utetribe.com]; 'Ryan.Swanson@epenergy.com' [Ryan.Swanson@epenergy.com]; 'debbie@breatheutah.org' [debbie@breatheutah.org]; miken@utetribe.com; 'CColclasure@bwenergylaw.com' [CColclasure@bwenergylaw.com]; 'rhrenko-browning@utahpetroleum.org' [rhrenko-browning@utahpetroleum.org]; Bean, Clayton [bean.clayton@epa.gov]; mberger@utah.gov; 'aaverett@sunrise-eng.com' [aaverett@sunrise-eng.com]; 'Ryan@kairosaerospace.com' [Ryan@kairosaerospace.com]; 'lonnief@utetribe.com' [lonnief@utetribe.com]; Ex. 6 Personal Privacy (PP) ; 'Djordan@newfield.com' [Djordan@newfield.com]; Dresser, Chris [Dresser.Chris@epa.gov]; 'jpatterson@ndnlaw.com' [jpatterson@ndnlaw.com]; 'Jhirschi@enervest.net' [Jhirschi@enervest.net]; 'chelsea.cantrelle@epenergy.com' [chelsea.cantrelle@epenergy.com]; Morales, Monica [Morales.Monica@epa.gov]; 'Chad.Schlichtemeier@anadarko.com' [Chad.Schlichtemeier@anadarko.com]; 'Adrienne.Sandoval@andeavor.com' [Adrienne.Sandoval@andeavor.com]; 'kburdick@Duchesne.utah.gov' [kburdick@Duchesne.utah.gov]; 'joe.sager@epenergy.com' [joe.sager@epenergy.com]; 'ssiffring@westernenergyalliance.org' [ssiffring@westernenergyalliance.org]; 'Karen_Pratt@xtoenergy.com' [Karen_Pratt@xtoenergy.com]; 'mariek@utetribe.com' [mariek@utetribe.com]; 'jmathis@tricountyhealth.com' [jmathis@tricountyhealth.com]; 'marc.mansfield@usu.edu' [marc.mansfield@usu.edu]; 'Lolsen@altamontenergy.com' [Lolsen@altamontenergy.com]; 'jmcqueen@crescentpointenergy.com' [jmcqueen@crescentpointenergy.com]; 'John.Spencer@simplot.com' [John.Spencer@simplot.com]; Lexie Wilson [lexiewilson@utah.gov]; 'evernon@blm.gov' [evernon@blm.gov]; Smith, Claudia [Smith.Claudia@epa.gov]; 'eehrmantraut@SLRconsulting.com' [eehrmantraut@SLRconsulting.com]; 'wesadams@utah.gov' [wesadams@utah.gov]; 'amatheson@utah.gov' [amatheson@utah.gov]; 'Angela.Zivkovich@anadarko.com' [Angela.Zivkovich@anadarko.com]; 'Spencer_Kimball@eogresources.com' [Spencer_Kimball@eogresources.com]; 'ashley@publiclandsolutions.org' [ashley@publiclandsolutions.org]; 'dbrown@tricountyhealth.com' [dbrown@tricountyhealth.com]; Jackson, Scott [Jackson.Scott@epa.gov]; 'scottchew@le.utah.gov' [scottchew@le.utah.gov]; Garvey, Megan [garvey.megan@epa.gov]; 'Daniel.D.Pring@andeavor.com' [Daniel.D.Pring@andeavor.com]; 'seth.lyman@usu.edu' [seth.lyman@usu.edu]; minnieg@utetribe.com; 'cpennell@utah.gov' [cpennell@utah.gov]; 'woswald@utah.gov' [woswald@utah.gov]; 'bstringer@uintah.utah.gov' [bstringer@uintah.utah.gov]; 'bmensinger@trinityconsultants.com' [bmensinger@trinityconsultants.com]; 'jwoodland@crescentpointenergy.com' [jwoodland@crescentpointenergy.com]; 'Ryan.Clerico@enefit.com' [Ryan.Clerico@enefit.com]; 'mstewart@redleafinc.com' [mstewart@redleafinc.com]; 'Jean.semborski@cop.com' [Jean.semborski@cop.com]; 'trang.tran@usu.edu' [trang.tran@usu.edu]; 'val.oman@epenergy.com' [val.oman@epenergy.com]; 'rpage@ie-cos.com' [rpage@ie-cos.com]; 'Thomas.H.Gibbons@andeavor.com' [Thomas.H.Gibbons@andeavor.com]; 'dmcneill@utah.gov' [dmcneill@utah.gov]; 'Andrea.Olsen@Simplot.com' [Andrea.Olsen@Simplot.com]; 'Eoman@altamontenergy.com' [Eoman@altamontenergy.com]
CC: Tonnesen, Gail [Tonnesen.Gail@epa.gov]; 'irene@uintabasin.org' [irene@uintabasin.org]; 'Douglas.Jordan@encana.com' [Douglas.Jordan@encana.com]

Subject: Uinta Basin Ozone Working Group Meeting - agenda and video/call-in information
Attachments: 2019 0411 Uinta Basin Ozone Working Group Meeting Agenda.docx
Location: Crossroads Community Center 50 E 200 S, Roosevelt, UT 84066

Start: 4/11/2019 8:30:00 PM
End: 4/11/2019 10:30:00 PM
Show Time As: Tentative

Recurrence: (none)

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Ex. 6 Personal Privacy (PP)) and the Utah Petroleum Association roundtable and community outreach dinner.

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Message

From: Marie Bradshaw Durrant [MBDurrant@rqn.com]
Sent: 3/12/2019 3:55:55 AM
To: Doris Vanden Akker [dvandenakker@RQN.COM]; 'aaverett@sunrise-eng.com' [aaverett@sunrise-eng.com]; 'Adrienne.Sandoval@andeavor.com' [Adrienne.Sandoval@andeavor.com]; 'amyc@utetribe.com' [amyc@utetribe.com]; 'Angela.Zivkovich@anadarko.com' [Angela.Zivkovich@anadarko.com]; 'ashley@publiclandsolutions.org' [ashley@publiclandsolutions.org]; 'bstringer@uintah.utah.gov' [bstringer@uintah.utah.gov]; 'Rhammer@SLRconsulting.com' [Rhammer@SLRconsulting.com]; 'bmensinger@trinityconsultants.com' [bmensinger@trinityconsultants.com]; 'Chad.Schlichtemeier@anadarko.com' [Chad.Schlichtemeier@anadarko.com]; 'chelsea.cantrelle@epenergy.com' [chelsea.cantrelle@epenergy.com]; 'CColclasure@bwenergylaw.com' [CColclasure@bwenergylaw.com]; Dresser, Chris [Dresser.Chris@epa.gov]; Beeler, Cindy [Beeler.Cindy@epa.gov]; Smith, Claudia [Smith.Claudia@epa.gov]; Bean, Clayton [bean.clayton@epa.gov]; 'corey.jones@epenergy.com' [corey.jones@epenergy.com]; 'Daniel.D.Pring@andeavor.com' [Daniel.D.Pring@andeavor.com]; 'dbrown@tricountyhealth.com' [dbrown@tricountyhealth.com]; 'dmcneill@utah.gov' [dmcneill@utah.gov]; 'debbie@breatheutah.org' [debbie@breatheutah.org]; 'Djordan@newfield.com' [Djordan@newfield.com]; 'Eoman@altamontenergy.com' [Eoman@altamontenergy.com]; 'eehrmantraut@SLRconsulting.com' [eehrmantraut@SLRconsulting.com]; 'evernon@blm.gov' [evernon@blm.gov]; 'gtodd@duchesne.utah.gov' [gtodd@duchesne.utah.gov]; 'huy.tran@usu.edu' [huy.tran@usu.edu]; 'jpatterson@ndnlaw.com' [jpatterson@ndnlaw.com]; 'Jwoodall@newfield.com' [Jwoodall@newfield.com]; 'jwoodland@crescentpointenergy.com' [jwoodland@crescentpointenergy.com]; 'Jean.semborski@cop.com' [Jean.semborski@cop.com]; 'joe.sager@epenergy.com' [joe.sager@epenergy.com]; 'John.Spencer@simplot.com' [John.Spencer@simplot.com]; Ex. 6 Personal Privacy (PP) 'jmathis@tricountyhealth.com' [jmathis@tricountyhealth.com]; 'Jhirschi@enervest.net' [Jhirschi@enervest.net]; 'Karen_Pratt@xtoenergy.com' [Karen_Pratt@xtoenergy.com]; 'kburdick@Duchesne.utah.gov' [kburdick@Duchesne.utah.gov]; 'Lolsen@altamontenergy.com' [Lolsen@altamontenergy.com]; Lexie Wilson [lexiewilson@utah.gov]; 'lonnief@utetribe.com' [lonnief@utetribe.com]; 'mariek@utetribe.com' [mariek@utetribe.com]; 'marc.mansfield@usu.edu' [marc.mansfield@usu.edu]; mberger@utah.gov; 'mstewart@redleafinc.com' [mstewart@redleafinc.com]; Garvey, Megan [garvey.megan@epa.gov]; miken@utetribe.com; minnieg@utetribe.com; Morales, Monica [Morales.Monica@epa.gov]; 'rpage@ie-cos.com' [rpage@ie-cos.com]; 'rhrenko-browning@utahpetroleum.org' [rhrenko-browning@utahpetroleum.org]; 'Ryan.Clerico@enefit.com' [Ryan.Clerico@enefit.com]; 'Ryan@kairosaerospace.com' [Ryan@kairosaerospace.com]; 'Ryan.Swanson@epenergy.com' [Ryan.Swanson@epenergy.com]; 'scottchew@le.utah.gov' [scottchew@le.utah.gov]; Jackson, Scott [Jackson.Scott@epa.gov]; 'seth.lyman@usu.edu' [seth.lyman@usu.edu]; 'svance@utah.gov' [svance@utah.gov]; 'Spencer_Kimball@eogresources.com' [Spencer_Kimball@eogresources.com]; 'ssiffring@westernenergyalliance.org' [ssiffring@westernenergyalliance.org]; 'Thomas.H.Gibbons@andeavor.com' [Thomas.H.Gibbons@andeavor.com]; 'trang.tran@usu.edu' [trang.tran@usu.edu]; 'ttodd@utah.gov' [ttodd@utah.gov]; 'val.oman@epenergy.com' [val.oman@epenergy.com]; 'vince.christensen@simplot.com' [vince.christensen@simplot.com]; 'woswald@utah.gov' [woswald@utah.gov]; 'jmcqueen@crescentpointenergy.com' [jmcqueen@crescentpointenergy.com]; 'Andrea.Olsen@Simplot.com' [Andrea.Olsen@Simplot.com]; 'cpennell@utah.gov' [cpennell@utah.gov]; Nancy Daher [ndaher@utah.gov]; 'amatheson@utah.gov' [amatheson@utah.gov]
Subject: RE: Uinta Basin Ozone Working Group Meeting

Hi All,

This is a reminder that our next Uinta Basin Ozone Working Group Meeting will be Tuesday, March 19 at 2:00. We will send out meeting video and call-in information next week. The proposed agenda is at the bottom of this email.

Please also mark your calendars for April 11 at 2:30 as an in-person meeting for the UBOWG in Roosevelt at the Cross Roads Community Center in coordination with the Utah Petroleum Association round table meeting and the Utah Division of Oil, Gas, and Mining hydrocarbon conference. We see this as an opportunity for the group to meet together in person again to process this past winter, and Utah DAQ will present the latest on the emissions inventory. We hope to have some other events as well that we will discuss at the meeting on the 19th.

Please let me know right away if there are additional agenda items for next week's meeting.

Marie

Uinta Basin Ozone Working Group Meeting
March 19, 2019

1. Report on recent exceedances
2. Utah DAQ presentation on design value calculation and implications for designation and timing
3. Is there a role for UBOWG in updating the public?
4. Getting processes in place for industry voluntary measures and preparing for next winter
5. April in-person meeting

Marie Bradshaw Durrant | Ray Quinney & Nebeker P.C. | 36 South State Street, Suite 1400 | Salt Lake City, Utah 84111
Direct: 801-323-3379 | Mobile: Ex. 6 Personal Privacy (PP) | Facsimile: 801-532-7543 | www.rqn.com | vCard

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-----Original Appointment-----
From: Doris Vanden Akker
Sent: Wednesday, February 13, 2019 3:40 PM
To: Doris Vanden Akker; 'aaverett@sunrise-eng.com'; 'Adrienne.Sandoval@andeavor.com'; 'amyc@utetribe.com'; 'Angela.Zivkovich@anadarko.com'; 'ashley@publiclandsolutions.org'; 'bstringer@uintah.utah.gov'; 'Rhammer@SLRconsulting.com'; 'bmensinger@trinityconsultants.com'; 'Chad.Schlichtemeier@anadarko.com'; 'chelsea.cantrelle@epenergy.com'; 'CColclasure@bwenergylaw.com'; 'Dresser.Chris@epa.gov'; 'Beeler.Cindy@epa.gov'; 'smith.claudia@epa.gov'; 'bean.clayton@epa.gov'; 'corey.jones@epenergy.com'; 'Daniel.D.Pring@andeavor.com'; 'dbrown@tricountyhealth.com'; 'dmcneill@utah.gov'; 'debbie@breatheutah.org'; 'Djordan@newfield.com'; 'Eoman@altamontenergy.com'; 'eehrmantraut@SLRconsulting.com'; 'evernon@blm.gov'; 'gtodd@duchesne.utah.gov'; 'huy.tran@usu.edu'; 'jpatterson@ndnlaw.com'; 'Jwoodall@newfield.com'; 'jwoodland@crescentpointenergy.com'; 'Jean.semborski@cop.com'; 'joe.sager@epenergy.com'; 'John.Spencer@simplot.com'; Ex. 6 Personal Privacy (PP) 'jmathis@tricountyhealth.com'; 'Jhirschi@enervest.net'; 'Karen_Pratt@xtoenergy.com'; 'kburdick@Duchesne.utah.gov'; 'Lolsen@altamontenergy.com'; 'lexiewilson@utah.gov'; 'lonnief@utetribe.com'; Marie Bradshaw Durrant; 'mariek@utetribe.com'; 'marc.mansfield@usu.edu'; 'mberger@utah.gov'; 'mstewart@redleafinc.com'; 'garvey.megan@epa.gov'; 'miken@utetribe.com'; 'minnieg@utetribe.com'; 'morales.monica@epa.gov'; 'rpage@ie-cos.com'; 'rhrenko-browning@utahpetroleum.org'; 'Ryan.Clerico@enefit.com'; 'Ryan@kairosaerospace.com'; 'Ryan.Swanson@epenergy.com'; 'scottchew@le.utah.gov'; 'jackson.scott@epa.gov'; 'seth.lyman@usu.edu'; 'svance@utah.gov'; 'Spencer_Kimball@eogresources.com'; 'ssiffring@westernenergyalliance.org'; 'Thomas.H.Gibbons@andeavor.com'; 'trang.tran@usu.edu'; 'ttodd@utah.gov'; 'val.oman@epenergy.com'; 'vince.christensen@simplot.com'; 'woswald@utah.gov'; 'jmcqueen@crescentpointenergy.com'; 'Andrea.Olsen@Simplot.com'; 'cpennell@utah.gov'; 'ndaher@utah.gov'; 'amatheson@utah.gov'
Subject: Uinta Basin Ozone Working Group Meeting
When: Tuesday, March 19, 2019 2:00 PM-3:00 PM (UTC-07:00) Mountain Time (US & Canada).
Where: Vernal, Salt Lake City, Denver

Message

From: Marie Bradshaw Durrant [MBDurrant@rqn.com]
Sent: 2/5/2019 5:25:22 PM
To: 'aaverett@sunrise-eng.com' [aaverett@sunrise-eng.com]; 'Adrienne.Sandoval@andeavor.com' [Adrienne.Sandoval@andeavor.com]; 'amyc@utetribe.com' [amyc@utetribe.com]; 'Angela.Zivkovich@anadarko.com' [Angela.Zivkovich@anadarko.com]; 'ashley@publiclandsolutions.org' [ashley@publiclandsolutions.org]; 'bstringer@uintah.utah.gov' [bstringer@uintah.utah.gov]; 'Rhammer@SLRconsulting.com' [Rhammer@SLRconsulting.com]; 'bmensinger@trinityconsultants.com' [bmensinger@trinityconsultants.com]; 'Chad.Schlichtemeier@anadarko.com' [Chad.Schlichtemeier@anadarko.com]; 'chelsea.cantrelle@epenergy.com' [chelsea.cantrelle@epenergy.com]; 'CColclasure@bwenergylaw.com' [CColclasure@bwenergylaw.com]; Dresser, Chris [Dresser.Chris@epa.gov]; Beeler, Cindy [Beeler.Cindy@epa.gov]; Smith, Claudia [Smith.Claudia@epa.gov]; Bean, Clayton [bean.clayton@epa.gov]; 'corey.jones@epenergy.com' [corey.jones@epenergy.com]; 'Daniel.D.Pring@andeavor.com' [Daniel.D.Pring@andeavor.com]; 'dbrown@tricountyhealth.com' [dbrown@tricountyhealth.com]; 'dmcneill@utah.gov' [dmcneill@utah.gov]; 'debbie@breatheutah.org' [debbie@breatheutah.org]; 'Djordan@newfield.com' [Djordan@newfield.com]; 'Eoman@altamontenergy.com' [Eoman@altamontenergy.com]; 'eehrmantraut@SLRconsulting.com' [eehrmantraut@SLRconsulting.com]; 'evernon@blm.gov' [evernon@blm.gov]; 'gtodd@duchesne.utah.gov' [gtodd@duchesne.utah.gov]; 'huy.tran@usu.edu' [huy.tran@usu.edu]; 'jpatterson@ndnlaw.com' [jpatterson@ndnlaw.com]; 'Jwoodall@newfield.com' [Jwoodall@newfield.com]; 'jwoodland@crescentpointenergy.com' [jwoodland@crescentpointenergy.com]; 'Jean.semborski@cop.com' [Jean.semborski@cop.com]; 'joe.sager@epenergy.com' [joe.sager@epenergy.com]; 'John.Spencer@simplot.com' [John.Spencer@simplot.com]; Ex. 6 Personal Privacy (PP) 'jmathis@tricountyhealth.com' [jmathis@tricountyhealth.com]; 'Jhirschi@enervest.net' [Jhirschi@enervest.net]; 'Karen_Pratt@xtoenergy.com' [Karen_Pratt@xtoenergy.com]; 'kburdick@Duchesne.utah.gov' [kburdick@Duchesne.utah.gov]; 'kvantassell@le.utah.gov' [kvantassell@le.utah.gov]; 'Lolsen@altamontenergy.com' [Lolsen@altamontenergy.com]; Lexie Wilson [lexiewilson@utah.gov]; 'lonnief@utetribe.com' [lonnief@utetribe.com]; Marie Bradshaw Durrant [MBDurrant@rqn.com]; 'mariek@utetribe.com' [mariek@utetribe.com]; 'marc.mansfield@usu.edu' [marc.mansfield@usu.edu]; mberger@utah.gov; 'mstewart@redleafinc.com' [mstewart@redleafinc.com]; Garvey, Megan [garvey.megan@epa.gov]; miken@utetribe.com; minnieg@utetribe.com; Morales, Monica [Morales.Monica@epa.gov]; 'rpage@ie-cos.com' [rpage@ie-cos.com]; 'rhrenko-browning@utahpetroleum.org' [rhrenko-browning@utahpetroleum.org]; 'Ryan.Clerico@enefit.com' [Ryan.Clerico@enefit.com]; 'Ryan@kairosaerospace.com' [Ryan@kairosaerospace.com]; 'Ryan.Swanson@epenergy.com' [Ryan.Swanson@epenergy.com]; 'scottchew@le.utah.gov' [scottchew@le.utah.gov]; Jackson, Scott [Jackson.Scott@epa.gov]; 'seth.lyman@usu.edu' [seth.lyman@usu.edu]; 'svance@utah.gov' [svance@utah.gov]; 'Spencer_Kimball@eogresources.com' [Spencer_Kimball@eogresources.com]; 'ssiffring@westernenergyalliance.org' [ssiffring@westernenergyalliance.org]; 'Thomas.H.Gibbons@andeavor.com' [Thomas.H.Gibbons@andeavor.com]; 'trang.tran@usu.edu' [trang.tran@usu.edu]; 'ttodd@utah.gov' [ttodd@utah.gov]; 'val.oman@epenergy.com' [val.oman@epenergy.com]; 'vince.christensen@simplot.com' [vince.christensen@simplot.com]; 'woswald@utah.gov' [woswald@utah.gov]; 'jmcqueen@crescentpointenergy.com' [jmcqueen@crescentpointenergy.com]; 'Andrea.Olsen@Simplot.com' [Andrea.Olsen@Simplot.com]; 'cpennell@utah.gov' [cpennell@utah.gov]; Nancy Daher [ndaher@utah.gov]; 'amatheson@utah.gov' [amatheson@utah.gov]
Subject: Uinta Basin Working Group Meeting - February 12
Attachments: 2019 0212 UBOWG Agenda.pdf; WY 2019 Standardized Annual OCP Checklist Template for Oil and Gas Operators.xlsx

Hi All,

Please find attached an agenda for the next UBOWG meeting on Tuesday, February 12 at 2:00 Mountain Time. As always we will have video conferencing and phone-in available. For those meeting in Denver, the video conference will be at Western Energy Alliance again:

- **Vernal** – USU campus in Vernal (320 N. Aggie Blvd.) in Room 101. Come through the main entrance, and it is the first door on your left.

- **Salt Lake City** – Ray Quinney & Nebeker, 36 South State Street, Suite 1400 (parking available in City Creek parking structure)
- **Denver** – Western Energy Alliance, 1775 Sherman St., Suite 2700 (ask for Stuart Siffring)
- **Phone in information:**
  - **One tap mobile** Ex. 6 Personal Privacy (PP) US
    US (New York)
  - **Dial by your location** Ex. 6 Personal Privacy (PP)
    - Meeting ID: Ex. 6 Personal Privacy (PP)
    - Find your local number: https://zoom.us/u/abHlDbxYdJ

  If you have trouble joining the meeting, please contact my assistant Doris (801-323-3418) or our IT specialist Gabriel (801-323-3482).

Also attached to this email is the Wyoming spreadsheet for ozone alert contingency measures for the oil and gas sector. This will be one of our topics at the meeting, so we are sending this spreadsheet so everyone can see how Wyoming has encouraged oil and gas operators to take and record voluntary measures taken during high ozone events.

Looking forward to seeing everyone again!

Marie

Marie Bradshaw Durrant | Ray Quinney & Nebeker P.C. | 36 South State Street, Suite 1400 | Salt Lake City, Utah 84111
Direct: 801-323-3379 | Mobile: Ex. 6 Personal Privacy (PP) | Facsimile: 801-532-7543 | www.rqn.com

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February 12, 2019

<u>Agenda for Uinta Basin Ozone Working Group</u>

1. Update on ozone conditions in the Basin this winter
    a. Northern Ute Tribe Air Quality Division
    b. Utah Division of Air Quality
    c. Ozone Alerts – overview of recent alerts, notification process and version 2.0
2. Learning from Wyoming program to track and recognize ozone event voluntary/contingency measures
3. Industry update on list of voluntary measures
4. Creating comprehensive industry list for alerts, reporting, and recognition
5. BLM plans for meteorological measurement systems in the Basin
6. Other issues and next meeting

Wyoming Air Quality Division: STANDARDIZED OZONE CONTINGENCY PLAN (OCP)

ANNUAL OCP for Oil and Gas

Annual OCP due date:

December 3, 2018

COMPANY NAME:		
COMPANY REPRESENTATIVE:		
DATE OF SUBMISSION:		

*Annual OCP submissions represent measures ANTICIPATED to be completed on an Ozone Action Day. In addition, there is a section for actions ANTICIPATED to be completed a day after an Ozone Action Day.

NOTES:
References to "all aspects of energy recovery and production" apply to Drilling, Completion, Production, Construction, Maintenance and other general activities.
Comment Boxes: Use to answer and expand upon any activity question or individual process.
The ANNUAL OCP checklist is a SEPARATE form from the Event Summary checklist. The ANNUAL OCP cheklist can be found online @ http://deq.wyoming.gov/aqd/winter-ozone/resources/contingency-plans/
Submit via email to: zachary.mangin@wyo.gov

ACTIONS: ***WDEQ-AQD is cognizant that not all companies can or will initiate all measures listed.***	**YES**	**NO**	**N/A**	**Comment Boxes:**
A. **Annual OCP submittal only:** Most current contact information for company representative(s) with regard to all wintertime ozone actions/literature				
B. **Annual OCP submittal only:** Submit as an attachment to WDEQ-AQD a comprehensive list of contractors/sub-contractors and service companies under contract with your company and expected to have a role in ozone contingency plan implementation. zachary.mangin@wyo.gov				
C. **Annual OCP submittal only:** Will your company commit to providing PRE-SEASON ozone contingency plan (OCP) awareness training for company personnel and all associated service company personnel?				Completion date:
D. Does your company plan on utilizing Best Management Practices (BMPs)?				If utilization of BMPs is not considered, please discuss why.
E. **Annual OCP submittal only:** Will your company and affiliated service companies commit to the suspension/shut-in of ALL energy recovery and production operations during the winter months?				

Annual OCP for:

ACTIONS: ***WDEQ-AQD is cognizant that not all companies can or will initiate all measures listed.***	**On Ozone Action Day**			**Day After Ozone Action Day**			**Comment Boxes:**
	YES	**NO**	**N / A**	**YES**	**NO**	**N / A**	
1. Will your company commit to providing a pre-shift awareness update regarding Ozone Action Day status/Contingency Plan implementation for all immediate staff and contracted employees?							If this action was not considered, please discuss why.
2. Will staff and affiliated service company employees be notified of an impending Ozone Action Day? 2a. How will this be achieved? (Attach a separate sheet of the notification process if necessary.)							If this action was not considered, please discuss why.
3. Will your company and affiliated service companies commit to not overfilling gas tanks and tightening fuel caps on vehicles associated with all aspects of energy recovery and production? (i.e., trucks, engines, snowcats, etc.)							If this action was not considered, please discuss why.
4. Will your company and affiliated service companies commit to minimize the idling of vehicles & engines associated with all aspects of energy recovery and production? (i.e., trucks, engines, construction equipment, etc.)							If this action was not considered, please discuss why.
5. Will your company and affiliated service companies commit to defer truck & equipment refueling to evening hours?							If this action was not considered, please discuss why.

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6. Will your company and affiliated service companies commit to keeping vehicles tuned up and tires properly inflated?							If this action was not considered, please discuss why.
7. Will your company and affiliated service companies commit to using environmentally safe paints, cleaning products & chemicals? (i.e., non-aerosol, low VOC paints)							If this action was not considered, please discuss why.
8. Will your company and affiliated service companies commit to reducing driving speed by 5 mph?							If this action was not considered, please discuss why.
9. Will your company and affiliated service companies commit to minimize the use of ancillary equipment with respect to all aspects of energy recovery and production? (i.e., light plants, portable generators, pumps, etc.)							If this action was not considered, please discuss why.
10. Will your company and affiliated service companies commit to minimize vehicle traffic and miles traveled? (consolidate trips, car-pool, postpone travel etc.)							If this action was not considered, please discuss why.
11. Will your company and affiliated service companies commit to utilizing various leak detection techniques to prevent/fix the venting of gas? 11a. List the type of activity that will be used to detect equipment leaks and timetables for inspection.							If this action was not considered, please discuss why.
12. Will your company and affiliated service companies commit to defer/postpone liquid hauling into and out of the field? 12a. On average, how many liquid hauling trips occur per day in relation to your operations?							If this action was not considered, please discuss why.
13. Will your company and affiliated service companies commit to suspend and/or reschedule the use of diesel and/or gasoline powered equipment associated with all aspects of energy recovery and production? (i.e., generators, engines,							If this action was not considered, please discuss why.
14. Will your company and affiliated service companies commit to postpone construction activities associated with all aspects of energy recovery and production?							If this action was not considered, please discuss why.
15. Will your company and affiliated service companies commit to postpone maintenance activities associated with all aspects of energy recovery and production?							If this action was not considered, please discuss why.

16. Will your company and affiliated service companies commit to limit and/or suspend drilling operations on Ozone Action Days?							If this action was not considered, please discuss why.
16a. Will your company and affiliated service companies commit to limit and/or suspend drilling operations throughout the							
17. Will your company and affiliated service companies commit to postpone fracking operations on Ozone Action Days?							If this action was not considered, please discuss why.
17a. Will your company and affiliated service companies commit to postpone fracking operations for the entire winter season?							
17b. How many engines does your company/service companies use per frac? Include number of controlled engines in use							
18. Will your company and affiliated service companies commit to postpone the initiation of new completion actions on Ozone Action Days?							If this action was not considered, please discuss why.
18a. Will your company and affiliated service companies commit to postpone the initiation of new completion actions for the							
19. Will your company and affiliated service companies commit to postpone the initiation of re-completion/work over actions on Ozone Action Days?							If this action was not considered, please discuss why.
19a. Will your company and affiliated service companies commit to postpone the initiation of re-completion/work over							
20. Will your company and affiliated service companies commit to postpone blowdown actions tied to all aspects of energy recovery and production?							If this action was not considered, please discuss why.
21. Will your company and affiliated service companies commit to turn down or control uncontrolled pneumatic heat trace pumps?							If this action was not considered, please discuss why.
22. Will your company and affiliated service companies commit to delay line pigging?							If this action was not considered, please discuss why.
23. Will your company and affiliated service companies commit to delay the charging of desiccant dehydration units?							If this action was not considered, please discuss why.
24. Will your company and affiliated service companies commit to short-term glycol dehydration unit shut down?							If this action was not considered, please discuss why.

25. Will your company and affiliated service companies commit to reducing glycol dehydration circulation rates on an Ozone Action Day?							If this action was not considered, please discuss why.
25a. Will your company and affiliated service companies commit to reducing glycol dehydration circulation rates for the							
25b. List actions/controls already in place that reduce glycol dehydrator emissions.							
26. Will your company and affiliated service companies commit to shutting down uncontrolled equipment associated with all aspects of energy recovery and production? (i.e., dehydration units, engines, pneumatic pumps?)							If this action was not considered, please discuss why.
26a. List equipment likely to be targeted for this action.							
27. Will your company and affiliated service companies commit to controlling uncontrolled equipment associated with all aspects of energy recovery and production?							If this action was not considered, please discuss why.
27a. List percentage of currently controlled equipment. Include date that 100% of equipment is anticipated to be controlled.							
28. Will your company and affiliated service companies commit to the suspension/shut-in of all energy recovery & production operations during a specific WDEQ-AQD declared Ozone Action Day? (short-term)							If this action was not considered, please discuss why.
29. List any year-round emission reduction activities your company employs:							
30. List any "winter season" emission reduction activities implemented regardless of Ozone Action Day status: *(include listed and unlisted activities)*							
31. List anticipated future emission reduction activities or ideas: *(i.e., operational procedures & equipment changes that help minimize emissions)*							
WDEQ-AQD is cognizant that not all companies can or will initiate all measures listed.							

Name
Title
Address
email
office
cell

Appointment

From: Marie Bradshaw Durrant [MBDurrant@rqn.com]
Sent: 1/4/2019 7:24:14 PM
To: 'dbrown@tricountyhealth.com' [dbrown@tricountyhealth.com]; 'vince.christensen@simplot.com' [vince.christensen@simplot.com]; 'kvantassell@le.utah.gov' [kvantassell@le.utah.gov]; Bean, Clayton [bean.clayton@epa.gov]; 'ashley@publiclandsolutions.org' [ashley@publiclandsolutions.org]; minnieg@utetribe.com; 'Lolsen@altamontenergy.com' [Lolsen@altamontenergy.com]; 'debbie@breatheutah.org' [debbie@breatheutah.org]; 'Chad.Schlichtemeier@anadarko.com' [Chad.Schlichtemeier@anadarko.com]; Smith, Claudia [Smith.Claudia@epa.gov]; 'rikki.hrenko-browning@enefit.com' [rikki.hrenko-browning@enefit.com]; Morales, Monica [Morales.Monica@epa.gov]; 'Jean.semborski@cop.com' [Jean.semborski@cop.com]; 'jmcqueen@crescentpointenergy.com' [jmcqueen@crescentpointenergy.com]; 'Thomas.H.Gibbons@andeavor.com' [Thomas.H.Gibbons@andeavor.com]; 'Ryan.Swanson@epenergy.com' [Ryan.Swanson@epenergy.com]; 'lonnief@utetribe.com' [lonnief@utetribe.com]; Ex. 6 Personal Privacy (PP) ; 'trang.tran@usu.edu' [trang.tran@usu.edu]; 'Rhammer@SLRconsulting.com' [Rhammer@SLRconsulting.com]; 'jmathis@tricountyhealth.com' [jmathis@tricountyhealth.com]; 'ssiffring@westernenergyalliance.org' [ssiffring@westernenergyalliance.org]; 'huy.tran@usu.edu' [huy.tran@usu.edu]; 'Ryan@kairosaerospace.com' [Ryan@kairosaerospace.com]; 'evernon@blm.gov' [evernon@blm.gov]; 'scottchew@le.utah.gov' [scottchew@le.utah.gov]; 'jwoodland@crescentpointenergy.com' [jwoodland@crescentpointenergy.com]; 'kburdick@Duchesne.utah.gov' [kburdick@Duchesne.utah.gov]; 'amyc@utetribe.com' [amyc@utetribe.com]; 'corey.jones@epenergy.com' [corey.jones@epenergy.com]; 'chelsea.cantrelle@epenergy.com' [chelsea.cantrelle@epenergy.com]; 'Ryan.Clerico@enefit.com' [Ryan.Clerico@enefit.com]; 'svance@utah.gov' [svance@utah.gov]; 'Jhirschi@enervest.net' [Jhirschi@enervest.net]; 'bstringer@uintah.utah.gov' [bstringer@uintah.utah.gov]; Dresser, Chris [Dresser.Chris@epa.gov]; miken@utetribe.com; 'eehrmantraut@SLRconsulting.com' [eehrmantraut@SLRconsulting.com]; 'bmensinger@trinityconsultants.com' [bmensinger@trinityconsultants.com]; 'mstewart@redleafinc.com' [mstewart@redleafinc.com]; mberger@utah.gov; 'Adrienne.Sandoval@andeavor.com' [Adrienne.Sandoval@andeavor.com]; 'rpage@ie-cos.com' [rpage@ie-cos.com]; 'gtodd@duchesne.utah.gov' [gtodd@duchesne.utah.gov]; 'seth.lyman@usu.edu' [seth.lyman@usu.edu]; 'mariek@utetribe.com' [mariek@utetribe.com]; 'CColclasure@bwenergylaw.com' [CColclasure@bwenergylaw.com]; Beeler, Cindy [Beeler.Cindy@epa.gov]; Garvey, Megan [garvey.megan@epa.gov]; 'Angela.Zivkovich@anadarko.com' [Angela.Zivkovich@anadarko.com]; 'Karen_Pratt@xtoenergy.com' [Karen_Pratt@xtoenergy.com]; 'Djordan@newfield.com' [Djordan@newfield.com]; 'Jwoodall@newfield.com' [Jwoodall@newfield.com]; 'woswald@utah.gov' [woswald@utah.gov]; 'aaverett@sunrise-eng.com' [aaverett@sunrise-eng.com]; Jackson, Scott [Jackson.Scott@epa.gov]; 'dmcneill@utah.gov' [dmcneill@utah.gov]; Lexie Wilson [lexiewilson@utah.gov]; 'joe.sager@epenergy.com' [joe.sager@epenergy.com]; 'Eoman@altamontenergy.com' [Eoman@altamontenergy.com]; 'Daniel.D.Pring@andeavor.com' [Daniel.D.Pring@andeavor.com]; 'ttodd@utah.gov' [ttodd@utah.gov]; 'Spencer_Kimball@eogresources.com' [Spencer_Kimball@eogresources.com]; 'val.oman@epenergy.com' [val.oman@epenergy.com]; 'John.Spencer@simplot.com' [John.Spencer@simplot.com]; 'marc.mansfield@usu.edu' [marc.mansfield@usu.edu]; 'jpatterson@ndnlaw.com' [jpatterson@ndnlaw.com]
CC: 'Semborski, Jean' [Jean.Semborski@conocophillips.com]; 'nhall@utah.gov' [nhall@utah.gov]; 'Olsen, Andrea' [andrea.olsen@Simplot.com]; Ex. 6 Personal Privacy (PP)

Subject: Uinta Basin Working Group Meeting
Location: Vernal, Salt Lake City, Denver

Start: 1/8/2019 9:00:00 PM
End: 1/8/2019 10:00:00 PM
Show Time As: Tentative

Recurrence: (none)

Message

From: Seth Lyman [seth.lyman@usu.edu]
Sent: 11/28/2018 12:01:11 AM
To: Marie Durrant [MBDurrant@rqn.com]; 'aaverett@sunrise-eng.com' [aaverett@sunrise-eng.com]; 'Adrienne.Sandoval@andeavor.com' [Adrienne.Sandoval@andeavor.com]; 'amyc@utetribe.com' [amyc@utetribe.com]; 'Angela.Zivkovich@anadarko.com' [Angela.Zivkovich@anadarko.com]; 'ashley@publiclandsolutions.org' [ashley@publiclandsolutions.org]; 'bstringer@uintah.utah.gov' [bstringer@uintah.utah.gov]; 'Rhammer@SLRconsulting.com' [Rhammer@SLRconsulting.com]; 'bmensinger@trinityconsultants.com' [bmensinger@trinityconsultants.com]; 'Chad.Schlichtemeier@anadarko.com' [Chad.Schlichtemeier@anadarko.com]; 'chelsea.cantrelle@epenergy.com' [chelsea.cantrelle@epenergy.com]; 'CColclasure@bwenergylaw.com' [CColclasure@bwenergylaw.com]; Dresser, Chris [Dresser.Chris@epa.gov]; Beeler, Cindy [Beeler.Cindy@epa.gov]; Smith, Claudia [Smith.Claudia@epa.gov]; Bean, Clayton [bean.clayton@epa.gov]; 'corey.jones@epenergy.com' [corey.jones@epenergy.com]; 'Daniel.D.Pring@andeavor.com' [Daniel.D.Pring@andeavor.com]; 'dbrown@tricountyhealth.com' [dbrown@tricountyhealth.com]; 'dmcneill@utah.gov' [dmcneill@utah.gov]; 'debbie@breatheutah.org' [debbie@breatheutah.org]; 'Djordan@newfield.com' [Djordan@newfield.com]; 'Eoman@altamontenergy.com' [Eoman@altamontenergy.com]; 'eehrmantraut@SLRconsulting.com' [eehrmantraut@SLRconsulting.com]; 'evernon@blm.gov' [evernon@blm.gov]; 'gtodd@duchesne.utah.gov' [gtodd@duchesne.utah.gov]; Huy Tran [huy.tran@usu.edu]; 'jpatterson@ndnlaw.com' [jpatterson@ndnlaw.com]; 'Jwoodall@newfield.com' [Jwoodall@newfield.com]; 'jwoodland@crescentpointenergy.com' [jwoodland@crescentpointenergy.com]; 'Jean.semborski@cop.com' [Jean.semborski@cop.com]; 'joe.sager@epenergy.com' [joe.sager@epenergy.com]; 'John.Spencer@simplot.com' [John.Spencer@simplot.com]; Ex. 6 Personal Privacy (PP) 'jmathis@tricountyhealth.com' [jmathis@tricountyhealth.com]; 'Jhirschi@enervest.net' [Jhirschi@enervest.net]; 'Karen_Pratt@xtoenergy.com' [Karen_Pratt@xtoenergy.com]; 'kburdick@Duchesne.utah.gov' [kburdick@Duchesne.utah.gov]; 'kvantassell@le.utah.gov' [kvantassell@le.utah.gov]; 'Lolsen@altamontenergy.com' [Lolsen@altamontenergy.com]; Lexie Wilson [lexiewilson@utah.gov]; 'lonnief@utetribe.com' [lonnief@utetribe.com]; 'mariek@utetribe.com' [mariek@utetribe.com]; Marc Mansfield [marc.mansfield@usu.edu]; mberger@utah.gov; 'mstewart@redleafinc.com' [mstewart@redleafinc.com]; Garvey, Megan [garvey.megan@epa.gov]; miken@utetribe.com; minnieg@utetribe.com; Morales, Monica [Morales.Monica@epa.gov]; 'rpage@ie-cos.com' [rpage@ie-cos.com]; 'rikki.hrenko-browning@enefit.com' [rikki.hrenko-browning@enefit.com]; 'Ryan.Clerico@enefit.com' [Ryan.Clerico@enefit.com]; 'Ryan@kairosaerospace.com' [Ryan@kairosaerospace.com]; 'Ryan.Swanson@epenergy.com' [Ryan.Swanson@epenergy.com]; 'scottchew@le.utah.gov' [scottchew@le.utah.gov]; Jackson, Scott [Jackson.Scott@epa.gov]; 'svance@utah.gov' [svance@utah.gov]; 'Spencer_Kimball@eogresources.com' [Spencer_Kimball@eogresources.com]; 'ssiffring@westernenergyalliance.org' [ssiffring@westernenergyalliance.org]; 'Thomas.H.Gibbons@andeavor.com' [Thomas.H.Gibbons@andeavor.com]; Trang Tran [trang.tran@usu.edu]; 'ttodd@utah.gov' [ttodd@utah.gov]; 'val.oman@epenergy.com' [val.oman@epenergy.com]; 'vince.christensen@simplot.com' [vince.christensen@simplot.com]; 'woswald@utah.gov' [woswald@utah.gov]; 'jmcqueen@crescentpointenergy.com' [jmcqueen@crescentpointenergy.com]
Subject: FW: Call for Abstracts for Science for Solutions Air Quality Conference
Attachments: image005.emz

I promised to send information about the Utah-centric air quality research conference that will be held in March. Below is the information. If any of you want to be on the email list for this conference, please let me know and I will add you. And anyone is of course welcome to submit an abstract and/or attend.

The air quality modeling technical workshop I mentioned will be held on Wednesday, March 27th at USU's Logan campus. We have a draft agenda together but we are working on the details. If any of you are interested in participating in the workshop, please let me know. The modeling workshop is largely separate from the conference and will have a separate registration process.

Seth

Seth Lyman, PhD
Bingham Research Center

Department of Chemistry and Biochemistry
Utah State University
320 N. Aggie Blvd.
Vernal, UT 84078
435-722-1740
binghamresearch.usu.edu

From: Seth Lyman
Sent: Tuesday, November 27, 2018 4:34 PM
To:
Subject: Call for Abstracts for Science for Solutions Air Quality Conference

CALL FOR ABSTRACTS

Thursday
March 28, 2019
Utah State University
Logan, Utah

Abstract Submission Deadline: February 12, 2019
General Registration Deadline: March 15, 2019

Air Quality: Science for Solutions is holding a full-day conference emphasizing scientific progress in the understanding of Utah's complicated and unique air quality issues. This is the third of an annual conference series organized by Utah State University, Weber State University, the University of Utah, Brigham Young University, and the Utah Division of Air Quality.

Abstracts are now being accepted for both, oral and poster presentations. Oral presentations will be 15 minutes in length followed by a five-minute question/answer period.

Student poster contest with prizes! Topics may include, but are not limited

to:

- **Air Pollution Chemistry and Measurements**
- **Regional Photochemical Modeling**
- **Meteorological Modeling and Great Salt Lake Studies**
- **Air Quality and Public Health Impacts**
- **Air Quality and Regional Climate Change**
- **Emissions Studies and Analysis**

- **Policy, Industry, and Economic Impacts**

Thanks to the generosity of our sponsors, **registration is only $10**.

For more information, or to submit an abstract, please visit our website at **airqualityscience.org**

Sponsored by:

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COLLEGE of ENGINEERING

UtahStateUniversity

Civil & Environmental ENGINEERING

Message

From: Marie Durrant [MBDurrant@rqn.com]
Sent: 11/26/2018 8:25:00 PM
To: 'aaverett@sunrise-eng.com' [aaverett@sunrise-eng.com]; 'Adrienne.Sandoval@andeavor.com' [Adrienne.Sandoval@andeavor.com]; 'amyc@utetribe.com' [amyc@utetribe.com]; 'Angela.Zivkovich@anadarko.com' [Angela.Zivkovich@anadarko.com]; 'ashley@publiclandsolutions.org' [ashley@publiclandsolutions.org]; 'bstringer@uintah.utah.gov' [bstringer@uintah.utah.gov]; 'Rhammer@SLRconsulting.com' [Rhammer@SLRconsulting.com]; 'bmensinger@trinityconsultants.com' [bmensinger@trinityconsultants.com]; 'Chad.Schlichtemeier@anadarko.com' [Chad.Schlichtemeier@anadarko.com]; 'chelsea.cantrelle@epenergy.com' [chelsea.cantrelle@epenergy.com]; 'CColclasure@bwenergylaw.com' [CColclasure@bwenergylaw.com]; Dresser, Chris [Dresser.Chris@epa.gov]; Beeler, Cindy [Beeler.Cindy@epa.gov]; Smith, Claudia [Smith.Claudia@epa.gov]; Bean, Clayton [bean.clayton@epa.gov]; 'corey.jones@epenergy.com' [corey.jones@epenergy.com]; 'Daniel.D.Pring@andeavor.com' [Daniel.D.Pring@andeavor.com]; 'dbrown@tricountyhealth.com' [dbrown@tricountyhealth.com]; 'dmcneill@utah.gov' [dmcneill@utah.gov]; 'debbie@breatheutah.org' [debbie@breatheutah.org]; 'Djordan@newfield.com' [Djordan@newfield.com]; 'Eoman@altamontenergy.com' [Eoman@altamontenergy.com]; 'eehrmantraut@SLRconsulting.com' [eehrmantraut@SLRconsulting.com]; 'evernon@blm.gov' [evernon@blm.gov]; 'gtodd@duchesne.utah.gov' [gtodd@duchesne.utah.gov]; 'huy.tran@usu.edu' [huy.tran@usu.edu]; 'jpatterson@ndnlaw.com' [jpatterson@ndnlaw.com]; 'Jwoodall@newfield.com' [Jwoodall@newfield.com]; 'jwoodland@crescentpointenergy.com' [jwoodland@crescentpointenergy.com]; 'Jean.semborski@cop.com' [Jean.semborski@cop.com]; 'joe.sager@epenergy.com' [joe.sager@epenergy.com]; 'John.Spencer@simplot.com' [John.Spencer@simplot.com]; Ex. 6 Personal Privacy (PP) 'jmathis@tricountyhealth.com' [jmathis@tricountyhealth.com]; 'Jhirschi@enervest.net' [Jhirschi@enervest.net]; 'Karen_Pratt@xtoenergy.com' [Karen_Pratt@xtoenergy.com]; 'kburdick@Duchesne.utah.gov' [kburdick@Duchesne.utah.gov]; 'kvantassell@le.utah.gov' [kvantassell@le.utah.gov]; 'Lolsen@altamontenergy.com' [Lolsen@altamontenergy.com]; Lexie Wilson [lexiewilson@utah.gov]; 'lonnief@utetribe.com' [lonnief@utetribe.com]; 'mariek@utetribe.com' [mariek@utetribe.com]; 'marc.mansfield@usu.edu' [marc.mansfield@usu.edu]; mberger@utah.gov; 'mstewart@redleafinc.com' [mstewart@redleafinc.com]; Garvey, Megan [garvey.megan@epa.gov]; miken@utetribe.com; minnieg@utetribe.com; Morales, Monica [Morales.Monica@epa.gov]; 'rpage@ie-cos.com' [rpage@ie-cos.com]; 'rikki.hrenko-browning@enefit.com' [rikki.hrenko-browning@enefit.com]; 'Ryan.Clerico@enefit.com' [Ryan.Clerico@enefit.com]; 'Ryan@kairosaerospace.com' [Ryan@kairosaerospace.com]; 'Ryan.Swanson@epenergy.com' [Ryan.Swanson@epenergy.com]; 'scottchew@le.utah.gov' [scottchew@le.utah.gov]; Jackson, Scott [Jackson.Scott@epa.gov]; 'seth.lyman@usu.edu' [seth.lyman@usu.edu]; 'svance@utah.gov' [svance@utah.gov]; 'Spencer_Kimball@eogresources.com' [Spencer_Kimball@eogresources.com]; 'ssiffring@westernenergyalliance.org' [ssiffring@westernenergyalliance.org]; 'Thomas.H.Gibbons@andeavor.com' [Thomas.H.Gibbons@andeavor.com]; 'trang.tran@usu.edu' [trang.tran@usu.edu]; 'ttodd@utah.gov' [ttodd@utah.gov]; 'val.oman@epenergy.com' [val.oman@epenergy.com]; 'vince.christensen@simplot.com' [vince.christensen@simplot.com]; 'woswald@utah.gov' [woswald@utah.gov]; 'jmcqueen@crescentpointenergy.com' [jmcqueen@crescentpointenergy.com]
CC: Doris Vanden Akker [dvandenakker@RQN.COM]; Gabriel Niculescu [niculescu@RQN.COM]
Subject: RE: Uinta Basin Ozone Working Group Agenda for November 27 Meeting

Hi All,

Below is dial-in information for the meeting tomorrow. We are using a new web-based system called Zoom. This system should allow more call-in spots if you cannot make it to the video conferencing locations. The call-in numbers are:

One tap mobile

Ex. 6 Personal Privacy (PP) US
US (New York)

If you are using a smartphone, the one click mobile is a link you can use to dial directly in to the audio portion.

You can also manually dial in using the dial-by-location numbers below:

Dial by your location

Ex. 6 Personal Privacy (PP) US
US (New York)

Meeting ID: Ex. 6 Personal Privacy (PP)

Find your local number: https://zoom.us/u/adeTlalzLL

If you have trouble joining the meeting, please contact my assistant Doris (801-323-3418) or our IT specialist Gabriel (801-323-3482).

We look forward to seeing you all tomorrow!

Marie

Marie Bradshaw Durrant | Ray Quinney & Nebeker P.C. | 36 South State Street, Suite 1400 | Salt Lake City, Utah 84111
Direct: 801-323-3379 | Mobile: Ex. 6 Personal Privacy (PP) | Facsimile: 801-532-7543 | www.rqn.com

This email is from a law firm and may contain privileged or confidential information. Any unauthorized disclosure, distribution, or other use of this email and its contents is prohibited. If you are not the intended recipient, please contact the sender and delete this email. Thank you.

From: Marie Durrant
Sent: Wednesday, November 21, 2018 2:52 PM
To: 'aaverett@sunrise-eng.com'; 'Adrienne.Sandoval@andeavor.com'; 'amyc@utetribe.com'; 'Angela.Zivkovich@anadarko.com'; 'ashley@publiclandsolutions.org'; 'bstringer@uintah.utah.gov'; 'Rhammer@SLRconsulting.com'; 'bmensinger@trinityconsultants.com'; 'Chad.Schlichtemeier@anadarko.com'; 'chelsea.cantrelle@epenergy.com'; 'CColclasure@bwenergylaw.com'; 'Dresser.Chris@epa.gov'; 'Beeler.Cindy@epa.gov'; 'smith.claudia@epa.gov'; 'bean.clayton@epa.gov'; 'corey.jones@epenergy.com'; 'Daniel.D.Pring@andeavor.com'; 'dbrown@tricountyhealth.com'; 'dmcneill@utah.gov'; 'debbie@breatheutah.org'; 'Djordan@newfield.com'; 'Eoman@altamontenergy.com'; 'eehrmantraut@SLRconsulting.com'; 'evernon@blm.gov'; 'gtodd@duchesne.utah.gov'; 'huy.tran@usu.edu'; 'jpatterson@ndnlaw.com'; 'Jwoodall@newfield.com'; 'jwoodland@crescentpointenergy.com'; 'Jean.semborski@cop.com'; 'joe.sager@epenergy.com'; 'John.Spencer@simplot.com'; Ex. 6 Personal Privacy (PP) 'jmathis@tricountyhealth.com'; 'Jhirschi@enervest.net'; 'Karen_Pratt@xtoenergy.com'; 'kburdick@Duchesne.utah.gov'; 'kvantassell@le.utah.gov'; 'Lolsen@altamontenergy.com'; 'lexiewilson@utah.gov'; 'lonnief@utetribe.com'; Marie Durrant; 'mariek@utetribe.com'; 'marc.mansfield@usu.edu'; 'mberger@utah.gov'; 'mstewart@redleafinc.com'; 'garvey.megan@epa.gov'; 'miken@utetribe.com'; 'minnieg@utetribe.com'; 'morales.monica@epa.gov'; 'rpage@ie-cos.com'; 'rikki.hrenko-browning@enefit.com'; 'Ryan.Clerico@enefit.com'; 'Ryan@kairosaerospace.com'; 'Ryan.Swanson@epenergy.com'; 'scottchew@le.utah.gov'; 'jackson.scott@epa.gov'; 'seth.lyman@usu.edu'; 'svance@utah.gov'; 'Spencer_Kimball@eogresources.com'; 'ssiffring@westernenergyalliance.org'; 'Thomas.H.Gibbons@andeavor.com'; 'trang.tran@usu.edu'; 'ttodd@utah.gov'; 'val.oman@epenergy.com'; 'vince.christensen@simplot.com'; 'woswald@utah.gov'; 'jmcqueen@crescentpointenergy.com'
Cc: Doris Vanden Akker
Subject: Uinta Basin Ozone Working Group Agenda for November 27 Meeting

Hi All,

Please find attached a proposed agenda for next week's Uinta Basin Ozone Working Group. The meeting will be on Tuesday, November 27, 2018, and we will have video conferencing at the usual three locations:

- Vernal - USU campus in Vernal (320 N. Aggie Blvd.) in Room 101. Come through the main entrance, and it is the first door on your left.

- Salt Lake City - Ray Quinney & Nebeker, 36 South State Street, Suite 1400
- Denver – EPA Region 8, 1595 Wynkoop St. (ask for Chris Dresser)

We are experimenting with a new system that should allow more call-in options. We will send call-in information before the meeting.

Please contact me with any suggestions, questions, or if others need to be added to our email list.

HAPPY THANKSGIVING TO ALL!

Marie

Marie Bradshaw Durrant | Ray Quinney & Nebeker P.C. | 36 South State Street, Suite 1400 | Salt Lake City, Utah 84111
Direct: 801-323-3379 | Mobile: Ex. 6 Personal Privacy (PP) | Facsimile: 801-532-7543 | www.rqn.com | vCard

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Message

From: Dresser, Chris [Dresser.Chris@epa.gov]
Sent: 11/23/2018 10:06:29 PM
To: Marie Durrant [MBDurrant@rqn.com]; 'aaverett@sunrise-eng.com' [aaverett@sunrise-eng.com]; 'Adrienne.Sandoval@andeavor.com' [Adrienne.Sandoval@andeavor.com]; 'amyc@utetribe.com' [amyc@utetribe.com]; 'Angela.Zivkovich@anadarko.com' [Angela.Zivkovich@anadarko.com]; 'ashley@publiclandsolutions.org' [ashley@publiclandsolutions.org]; 'bstringer@uintah.utah.gov' [bstringer@uintah.utah.gov]; 'Rhammer@SLRconsulting.com' [Rhammer@SLRconsulting.com]; 'bmensinger@trinityconsultants.com' [bmensinger@trinityconsultants.com]; 'Chad.Schlichtemeier@anadarko.com' [Chad.Schlichtemeier@anadarko.com]; 'chelsea.cantrelle@epenergy.com' [chelsea.cantrelle@epenergy.com]; 'CColclasure@bwenergylaw.com' [CColclasure@bwenergylaw.com]; Beeler, Cindy [Beeler.Cindy@epa.gov]; Smith, Claudia [Smith.Claudia@epa.gov]; Bean, Clayton [bean.clayton@epa.gov]; 'corey.jones@epenergy.com' [corey.jones@epenergy.com]; 'Daniel.D.Pring@andeavor.com' [Daniel.D.Pring@andeavor.com]; 'dbrown@tricountyhealth.com' [dbrown@tricountyhealth.com]; 'dmcneill@utah.gov' [dmcneill@utah.gov]; 'debbie@breatheutah.org' [debbie@breatheutah.org]; 'Djordan@newfield.com' [Djordan@newfield.com]; 'Eoman@altamontenergy.com' [Eoman@altamontenergy.com]; 'eehrmantraut@SLRconsulting.com' [eehrmantraut@SLRconsulting.com]; 'evernon@blm.gov' [evernon@blm.gov]; 'gtodd@duchesne.utah.gov' [gtodd@duchesne.utah.gov]; 'huy.tran@usu.edu' [huy.tran@usu.edu]; 'jpatterson@ndnlaw.com' [jpatterson@ndnlaw.com]; 'Jwoodall@newfield.com' [Jwoodall@newfield.com]; 'jwoodland@crescentpointenergy.com' [jwoodland@crescentpointenergy.com]; 'Jean.semborski@cop.com' [Jean.semborski@cop.com]; 'joe.sager@epenergy.com' [joe.sager@epenergy.com]; 'John.Spencer@simplot.com' [John.Spencer@simplot.com]; Ex. 6 Personal Privacy (PP) 'jmathis@tricountyhealth.com' [jmathis@tricountyhealth.com]; 'Jhirschi@enervest.net' [Jhirschi@enervest.net]; 'Karen_Pratt@xtoenergy.com' [Karen_Pratt@xtoenergy.com]; 'kburdick@Duchesne.utah.gov' [kburdick@Duchesne.utah.gov]; 'kvantassell@le.utah.gov' [kvantassell@le.utah.gov]; 'Lolsen@altamontenergy.com' [Lolsen@altamontenergy.com]; Lexie Wilson [lexiewilson@utah.gov]; 'lonnief@utetribe.com' [lonnief@utetribe.com]; 'mariek@utetribe.com' [mariek@utetribe.com]; 'marc.mansfield@usu.edu' [marc.mansfield@usu.edu]; mberger@utah.gov; 'mstewart@redleafinc.com' [mstewart@redleafinc.com]; Garvey, Megan [garvey.megan@epa.gov]; miken@utetribe.com; minnieg@utetribe.com; Morales, Monica [Morales.Monica@epa.gov]; 'rpage@ie-cos.com' [rpage@ie-cos.com]; 'rikki.hrenko-browning@enefit.com' [rikki.hrenko-browning@enefit.com]; 'Ryan.Clerico@enefit.com' [Ryan.Clerico@enefit.com]; 'Ryan@kairosaerospace.com' [Ryan@kairosaerospace.com]; 'Ryan.Swanson@epenergy.com' [Ryan.Swanson@epenergy.com]; 'scottchew@le.utah.gov' [scottchew@le.utah.gov]; Jackson, Scott [Jackson.Scott@epa.gov]; 'seth.lyman@usu.edu' [seth.lyman@usu.edu]; 'svance@utah.gov' [svance@utah.gov]; 'Spencer_Kimball@eogresources.com' [Spencer_Kimball@eogresources.com]; 'ssiffring@westernenergyalliance.org' [ssiffring@westernenergyalliance.org]; 'Thomas.H.Gibbons@andeavor.com' [Thomas.H.Gibbons@andeavor.com]; 'trang.tran@usu.edu' [trang.tran@usu.edu]; 'ttodd@utah.gov' [ttodd@utah.gov]; 'val.oman@epenergy.com' [val.oman@epenergy.com]; 'vince.christensen@simplot.com' [vince.christensen@simplot.com]; 'woswald@utah.gov' [woswald@utah.gov]; 'jmcqueen@crescentpointenergy.com' [jmcqueen@crescentpointenergy.com]
CC: Doris Vanden Akker [dvandenakker@RQN.COM]
Subject: RE: Uinta Basin Ozone Working Group Agenda for November 27 Meeting

Please email me if you plan on attending at the Denver EPA office location.

Thanks,
-Chris

Chris Dresser
U.S. EPA – Region 8
1595 Wynkoop Street
Denver, Colorado 80202-1129
Phone: (303) 312-6385

From: Marie Durrant <MBDurrant@rqn.com>
Sent: Wednesday, November 21, 2018 2:52 PM
To: 'aaverett@sunrise-eng.com' <aaverett@sunrise-eng.com>; 'Adrienne.Sandoval@andeavor.com' <Adrienne.Sandoval@andeavor.com>; 'amyc@utetribe.com' <amyc@utetribe.com>; 'Angela.Zivkovich@anadarko.com' <Angela.Zivkovich@anadarko.com>; 'ashley@publiclandsolutions.org' <ashley@publiclandsolutions.org>; 'bstringer@uintah.utah.gov' <bstringer@uintah.utah.gov>; 'Rhammer@SLRconsulting.com' <Rhammer@SLRconsulting.com>; 'bmensinger@trinityconsultants.com' <bmensinger@trinityconsultants.com>; 'Chad.Schlichtemeier@anadarko.com' <Chad.Schlichtemeier@anadarko.com>; 'chelsea.cantrelle@epenergy.com' <chelsea.cantrelle@epenergy.com>; 'CColclasure@bwenergylaw.com' <CColclasure@bwenergylaw.com>; Dresser, Chris <Dresser.Chris@epa.gov>; Beeler, Cindy <Beeler.Cindy@epa.gov>; Smith, Claudia <Smith.Claudia@epa.gov>; Bean, Clayton <bean.clayton@epa.gov>; 'corey.jones@epenergy.com' <corey.jones@epenergy.com>; 'Daniel.D.Pring@andeavor.com' <Daniel.D.Pring@andeavor.com>; 'dbrown@tricountyhealth.com' <dbrown@tricountyhealth.com>; 'dmcneill@utah.gov' <dmcneill@utah.gov>; 'debbie@breatheutah.org' <debbie@breatheutah.org>; 'Djordan@newfield.com' <Djordan@newfield.com>; 'Eoman@altamontenergy.com' <Eoman@altamontenergy.com>; 'eehrmantraut@SLRconsulting.com' <eehrmantraut@SLRconsulting.com>; 'evernon@blm.gov' <evernon@blm.gov>; 'gtodd@duchesne.utah.gov' <gtodd@duchesne.utah.gov>; 'huy.tran@usu.edu' <huy.tran@usu.edu>; 'jpatterson@ndnlaw.com' <jpatterson@ndnlaw.com>; 'Jwoodall@newfield.com' <Jwoodall@newfield.com>; 'jwoodland@crescentpointenergy.com' <jwoodland@crescentpointenergy.com>; 'Jean.semborski@cop.com' <Jean.semborski@cop.com>; 'joe.sager@epenergy.com' <joe.sager@epenergy.com>; 'John.Spencer@simplot.com' <John.Spencer@simplot.com>; Ex. 6 Personal Privacy (PP); 'jmathis@tricountyhealth.com' <jmathis@tricountyhealth.com>; 'Jhirschi@enervest.net' <Jhirschi@enervest.net>; 'Karen_Pratt@xtoenergy.com' <Karen_Pratt@xtoenergy.com>; 'kburdick@Duchesne.utah.gov' <kburdick@Duchesne.utah.gov>; 'kvantassell@le.utah.gov' <kvantassell@le.utah.gov>; 'Lolsen@altamontenergy.com' <Lolsen@altamontenergy.com>; Lexie Wilson <lexiewilson@utah.gov>; 'lonnief@utetribe.com' <lonnief@utetribe.com>; Marie Durrant <MBDurrant@rqn.com>; 'mariek@utetribe.com' <mariek@utetribe.com>; 'marc.mansfield@usu.edu' <marc.mansfield@usu.edu>; mberger@utah.gov; 'mstewart@redleafinc.com' <mstewart@redleafinc.com>; Garvey, Megan <garvey.megan@epa.gov>; miken@utetribe.com; minnieg@utetribe.com; Morales, Monica <Morales.Monica@epa.gov>; 'rpage@ie-cos.com' <rpage@ie-cos.com>; 'rikki.hrenko-browning@enefit.com' <rikki.hrenko-browning@enefit.com>; 'Ryan.Clerico@enefit.com' <Ryan.Clerico@enefit.com>; 'Ryan@kairosaerospace.com' <Ryan@kairosaerospace.com>; 'Ryan.Swanson@epenergy.com' <Ryan.Swanson@epenergy.com>; 'scottchew@le.utah.gov' <scottchew@le.utah.gov>; Jackson, Scott <Jackson.Scott@epa.gov>; 'seth.lyman@usu.edu' <seth.lyman@usu.edu>; 'svance@utah.gov' <svance@utah.gov>; 'Spencer_Kimball@eogresources.com' <Spencer_Kimball@eogresources.com>; 'ssiffring@westernenergyalliance.org' <ssiffring@westernenergyalliance.org>; 'Thomas.H.Gibbons@andeavor.com' <Thomas.H.Gibbons@andeavor.com>; 'trang.tran@usu.edu' <trang.tran@usu.edu>; 'ttodd@utah.gov' <ttodd@utah.gov>; 'val.oman@epenergy.com' <val.oman@epenergy.com>; 'vince.christensen@simplot.com' <vince.christensen@simplot.com>; 'woswald@utah.gov' <woswald@utah.gov>; 'jmcqueen@crescentpointenergy.com' <jmcqueen@crescentpointenergy.com>
Cc: Doris Vanden Akker <dvandenakker@RQN.COM>
Subject: Uinta Basin Ozone Working Group Agenda for November 27 Meeting

Hi All,

Please find attached a proposed agenda for next week's Uinta Basin Ozone Working Group. The meeting will be on Tuesday, November 27, 2018, and we will have video conferencing at the usual three locations:

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- Denver – EPA Region 8, 1595 Wynkoop St. (ask for Chris Dresser)

We are experimenting with a new system that should allow more call-in options. We will send call-in information before the meeting.

Please contact me with any suggestions, questions, or if others need to be added to our email list.

HAPPY THANKSGIVING TO ALL!

Marie

Marie Bradshaw Durrant | Ray Quinney & Nebeker P.C. | 36 South State Street, Suite 1400 | Salt Lake City, Utah 84111
Direct: 801-323-3379 | Mobile: Ex. 6 Personal Privacy (PP) | Facsimile: 801-532-7543 | www.rqn.com | vCard

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Appointment

From: Marie Durrant [MBDurrant@rqn.com]
Sent: 11/21/2018 11:16:02 PM
To: 'aaverett@sunrise-eng.com' [aaverett@sunrise-eng.com]; 'Adrienne.Sandoval@andeavor.com' [Adrienne.Sandoval@andeavor.com]; 'amyc@utetribe.com' [amyc@utetribe.com]; 'Angela.Zivkovich@anadarko.com' [Angela.Zivkovich@anadarko.com]; 'ashley@publiclandsolutions.org' [ashley@publiclandsolutions.org]; 'bstringer@uintah.utah.gov' [bstringer@uintah.utah.gov]; 'Rhammer@SLRconsulting.com' [Rhammer@SLRconsulting.com]; 'bmensinger@trinityconsultants.com' [bmensinger@trinityconsultants.com]; 'Chad.Schlichtemeier@anadarko.com' [Chad.Schlichtemeier@anadarko.com]; 'chelsea.cantrelle@epenergy.com' [chelsea.cantrelle@epenergy.com]; 'CColclasure@bwenergylaw.com' [CColclasure@bwenergylaw.com]; Dresser, Chris [Dresser.Chris@epa.gov]; Beeler, Cindy [Beeler.Cindy@epa.gov]; Smith, Claudia [Smith.Claudia@epa.gov]; Bean, Clayton [bean.clayton@epa.gov]; 'corey.jones@epenergy.com' [corey.jones@epenergy.com]; 'Daniel.D.Pring@andeavor.com' [Daniel.D.Pring@andeavor.com]; 'dbrown@tricountyhealth.com' [dbrown@tricountyhealth.com]; 'dmcneill@utah.gov' [dmcneill@utah.gov]; 'debbie@breatheutah.org' [debbie@breatheutah.org]; 'Djordan@newfield.com' [Djordan@newfield.com]; 'Eoman@altamontenergy.com' [Eoman@altamontenergy.com]; 'eehrmantraut@SLRconsulting.com' [eehrmantraut@SLRconsulting.com]; 'evernon@blm.gov' [evernon@blm.gov]; 'gtodd@duchesne.utah.gov' [gtodd@duchesne.utah.gov]; 'huy.tran@usu.edu' [huy.tran@usu.edu]; 'jpatterson@ndnlaw.com' [jpatterson@ndnlaw.com]; 'Jwoodall@newfield.com' [Jwoodall@newfield.com]; 'jwoodland@crescentpointenergy.com' [jwoodland@crescentpointenergy.com]; 'Jean.semborski@cop.com' [Jean.semborski@cop.com]; 'joe.sager@epenergy.com' [joe.sager@epenergy.com]; 'John.Spencer@simplot.com' [John.Spencer@simplot.com]; **Ex. 6 Personal Privacy (PP)**; 'jmathis@tricountyhealth.com' [jmathis@tricountyhealth.com]; 'Jhirschi@enervest.net' [Jhirschi@enervest.net]; 'Karen_Pratt@xtoenergy.com' [Karen_Pratt@xtoenergy.com]; 'kburdick@Duchesne.utah.gov' [kburdick@Duchesne.utah.gov]; 'kvantassell@le.utah.gov' [kvantassell@le.utah.gov]; 'Lolsen@altamontenergy.com' [Lolsen@altamontenergy.com]; Lexie Wilson [lexiewilson@utah.gov]; 'lonnief@utetribe.com' [lonnief@utetribe.com]; 'mariek@utetribe.com' [mariek@utetribe.com]; 'marc.mansfield@usu.edu' [marc.mansfield@usu.edu]; mberger@utah.gov; 'mstewart@redleafinc.com' [mstewart@redleafinc.com]; Garvey, Megan [garvey.megan@epa.gov]; miken@utetribe.com; minnieg@utetribe.com; Morales, Monica [Morales.Monica@epa.gov]; 'rpage@ie-cos.com' [rpage@ie-cos.com]; 'rikki.hrenko-browning@enefit.com' [rikki.hrenko-browning@enefit.com]; 'Ryan.Clerico@enefit.com' [Ryan.Clerico@enefit.com]; 'Ryan@kairosaerospace.com' [Ryan@kairosaerospace.com]; 'Ryan.Swanson@epenergy.com' [Ryan.Swanson@epenergy.com]; 'scottchew@le.utah.gov' [scottchew@le.utah.gov]; Jackson, Scott [Jackson.Scott@epa.gov]; 'seth.lyman@usu.edu' [seth.lyman@usu.edu]; 'svance@utah.gov' [svance@utah.gov]; 'Spencer_Kimball@eogresources.com' [Spencer_Kimball@eogresources.com]; 'ssiffring@westernenergyalliance.org' [ssiffring@westernenergyalliance.org]; 'Thomas.H.Gibbons@andeavor.com' [Thomas.H.Gibbons@andeavor.com]; 'trang.tran@usu.edu' [trang.tran@usu.edu]; 'ttodd@utah.gov' [ttodd@utah.gov]; 'val.oman@epenergy.com' [val.oman@epenergy.com]; 'vince.christensen@simplot.com' [vince.christensen@simplot.com]; 'woswald@utah.gov' [woswald@utah.gov]; 'jmcqueen@crescentpointenergy.com' [jmcqueen@crescentpointenergy.com]; Doris Vanden Akker [dvandenakker@RQN.COM]

Subject: Uinta Basin Ozone Working Group
Attachments: UBOWG Draft Agenda 11-27-18.docx
Location: Vernal, Salt Lake City, Denver

Start: 11/27/2018 9:00:00 PM
End: 11/27/2018 11:00:00 PM
Show Time As: Tentative

Recurrence: (none)

- Vernal - USU campus in Vernal (320 N. Aggie Blvd.) in Room 101. Come through the main entrance, and it is the first door on your left.
- Salt Lake City - Ray Quinney & Nebeker, 36 South State Street, Suite 1400
- Denver – EPA Region 8, 1595 Wynkoop St. (ask for Chris Dresser)

•

Message

From: Garvey, Megan [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7623E34F292C43ECBB4B01555594B604-GARVEY, MEG]
Sent: 6/30/2020 2:59:30 PM
To: Lee Fuller [lfuller@ipaa.org]
Subject: RE: Checking in

Thanks, Lee. I enjoyed working with you. We do not have a name to share publicly, but it should just be a short matter of time. I will share this note internally and ask that the Agency send you a follow up note.

Megan

Megan E. Garvey
Senior Counselor
Ex. 6 Personal Privacy (PP)

From: Lee Fuller <lfuller@ipaa.org>
Sent: Tuesday, June 30, 2020 7:36 AM
To: Garvey, Megan <garvey.megan@epa.gov>
Subject: Re: Checking in

Good luck to you, Megan. I've enjoyed working with you in your different careers. Tucson is a nice place -- somewhat hot and dry though.

Any replacement to contact?

Lee Fuller

From: Garvey, Megan <garvey.megan@epa.gov>
Sent: Tuesday, June 30, 2020 9:33 AM
To: Megan Garvey <meganelysegarvey@gmail.com>
Subject: Checking in

Good morning,

I hope you are safe and well.

A quick note to let you know that I am leaving EPA (and logging in my last few hours of work this morning). Ex. 6 Personal Privacy (PP)
Ex. 6 Personal Privacy (PP)

I enjoyed working with you and I hope our paths cross again soon. Please keep in touch.

Take good care, Megan

Ex. 6 Personal Privacy (PP)

Megan E. Garvey
Senior Counselor
Office of the Administrator

Message

From: Garvey, Megan [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7623E34F292C43ECBB4B01555594B604-GARVEY, MEG]
Sent: 6/30/2020 2:51:32 PM
To: Kathleen Sgamma [ksgamma@westernenergyalliance.org]
Subject: RE: Checking in

Thank you. The pleasure is mine, Kathleen. I've been to Tucson twice now – excited to explore the area.

Take care.

Megan E. Garvey
Senior Counselor
Ex. 6 Personal Privacy (PP)

From: Kathleen Sgamma <ksgamma@westernenergyalliance.org>
Sent: Tuesday, June 30, 2020 8:04 AM
To: Garvey, Megan <garvey.megan@epa.gov>
Subject: RE: Checking in

Good luck Megan! Tucson's great.

It's been such a pleasure working with you.
Kathleen

From: Garvey, Megan [mailto:garvey.megan@epa.gov]
Sent: Tuesday, June 30, 2020 7:33 AM
To: Megan Garvey
Subject: Checking in

Good morning,

I hope you are safe and well.

A quick note to let you know that I am leaving EPA (and logging in my last few hours of work this morning). Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP)

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Take good care, Megan

Ex. 6 Personal Privacy (PP)

Megan E. Garvey
Senior Counselor
Office of the Administrator
U.S. Environmental Protection Agency

Message

From: Garvey, Megan [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7623E34F292C43ECBB4B01555594B604-GARVEY, MEG]
Sent: 10/11/2018 8:42:59 PM
To: Stuart Siffring [ssiffring@westernenergyalliance.org]
Subject: RE: Western Energy Alliance, COGA, CPC meeting with EPA

Hi, Stuart,

Thank you for the email. It was great to see you, too.

I am happy to work with you to coordinate a meeting.

Aside from me and Doug – should I include anyone else from Region 8? Right now, Oct. 25 is fairly open for both of us (9a; 10a or 1p). Nov. 7 (2p or 3p) and Nov. 8 (9a; 1p; 2p or 3p) look good, too.

Calendars fill up fast (as you probably remember!) – so please let me know if one of these dates looks promising. Also, any discussion topics in mind?

Thanks, Megan

Megan E. Garvey
Senior Counselor to the Regional Administrator
US EPA, Region 8
Work: 303.312.6192 | Cell: Ex. 6 Personal Privacy (PP)

From: Stuart Siffring [mailto:ssiffring@westernenergyalliance.org]
Sent: Thursday, October 11, 2018 9:56 AM
To: Garvey, Megan <garvey.megan@epa.gov>
Subject: Western Energy Alliance, COGA, CPC meeting with EPA

Hi Megan,

It was great to see you at in Coeur D'Alene last week, what a beautiful place for a conference! Congrats again on your new position, it is a great place to work. I got a chance to talk with Doug for a little bit there and brought up trying to schedule a meeting between WEA, COGA, CPC, and EPA. He mentioned that you were also trying to set something like that up and that I should coordinate the details through you. Does that sound right? If so, I am happy to do the work coordinating the trades if you can come up with a few times over the next month or so that would work for Doug. Thanks for the help, talk to you soon!

-Stuart

Stuart Siffring, PE
Regulatory Analyst
Western Energy Alliance
1775 Sherman St. #2700
Denver, CO 80202
ssiffring@westernenergyalliance.org
303-501-1060

Message

From: Garvey, Megan [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7623E34F292C43ECBB4B01555594B604-GARVEY, MEG]
Sent: 6/30/2020 1:33:29 PM
To: Ex. 6 Personal Privacy (PP)
BCC: Todd Parfitt [todd.parfitt@wyo.gov]; nancy.vehr1@wyo.gov; lhelms@nd.gov; chuck.brown@la.gov; lfuller@ipaa.org; Stephanie Meadows [Meadows@api.org]; Matthew Todd [toddm@theenvironmentalpartnership.org]; ksgamma@westernenergyalliance.org; mpaque@gwpc.org; Amy Emmert [emmerta@api.org]; lfuller@ipaa.org; Matthew Todd [toddm@theenvironmentalpartnership.org]; 'Kathleen Sgamma' [ksgamma@westernenergyalliance.org]; Greg Schrab [gschrab@sm-energy.com]; ksgamma@westernenergyalliance.org; Jesse Sandlin [Jesse.Sandlin@nblenergy.com]; 'Maggi Young' [maggi.young@chk.com]; Rikki hrenko-browning [rhrenko-browning@utahpetroleum.org]; bthompson@axpc.us; Christy Woodward [christy.woodward@coga.org]; bergt@aoga.org; Patrick Padilla (patrick_padilla@eogresources.com) [patrick_padilla@eogresources.com]; Ryan Steadley [steadley@strongerinc.org]; Stephanie Meadows [Meadows@api.org]; Smythe Anderson [AndersonS@api.org]; dick.francis@shell.com; Wendy Kirchoff [Wendy.Kirchoff@nblenergy.com]; lfuller@ipaa.org; Jacus, John [John.Jacus@dgslaw.com]; shea.loper@ovintiv.com; Jennifer Biever [jbiever@lewisbess.com]; London, Ivan [ivan.london@bclplaw.com]; lbowman@axpc.org; Andrew Casper [casper@ooga.org]; Mike Hightower [mmhightower@q.com]; Jon Goldstein [jgoldstein@edf.org]; Jennifer McQueen [jmcqueen@finleyresources.com]; ewaeckerlin@bhfs.com; cabrera.misael@azdeq.gov
Subject: Checking in

Good morning,

I hope you are safe and well.

A quick note to let you know that I am leaving EPA (and logging in my last few hours of work this morning). My family

Ex. 6 Personal Privacy (PP)

I enjoyed working with you and I hope our paths cross again soon. Please keep in touch.

Take good care, Megan

Ex. 6 Personal Privacy (PP)

Megan E. Garvey
Senior Counselor
Office of the Administrator
U.S. Environmental Protection Agency

Message

From: Garvey, Megan [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7623E34F292C43ECBB4B01555594B604-GARVEY, MEG]
Sent: 5/11/2020 8:42:25 PM
To: Megan Garvey [garvey.megan@epa.gov]
CC: Mejias, Melissa [mejias.melissa@epa.gov]
BCC: lwrotenbery@iogcc.state.ok.us; mpaque@gwpc.org; Amy Emmert [emmerta@api.org]; claff@api.org; lfuller@ipaa.org; Elizabeth.Craddock@iadc.org; ksgamma@westernenergyalliance.org; Matthew Todd [toddm@theenvironmentalpartnership.org]; 'Kathleen Sgamma' [ksgamma@westernenergyalliance.org]; Greg Schrab [gschrab@sm-energy.com]; Jesse Sandlin [Jesse.Sandlin@nblenergy.com]; 'Maggi Young' [maggi.young@chk.com]; Rikki hrenko-browning [rhrenko-browning@utahpetroleum.org]; bthompson@axpc.us; Christy Woodward [christy.woodward@coga.org]; 'Djordan@newfield.com' [Djordan@newfield.com]; bergt@aoga.org; Patrick Padilla (patrick_padilla@eogresources.com) [patrick_padilla@eogresources.com]; Ryan Steadley [steadley@strongerinc.org]; Stephanie Meadows [Meadows@api.org]; Smythe Anderson [AndersonS@api.org]; dick.francis@shell.com; Wendy Kirchoff [Wendy.Kirchoff@nblenergy.com]; lfuller@ipaa.org; Jacus, John [John.Jacus@dgslaw.com]; lwrotenbery@iogcc.state.ok.us; shea.loper@ovintiv.com; Jennifer Biever [jbiever@lewisbess.com]; Eric P. Waeckerlin [EPWaeckerlin@hollandhart.com]; London, Ivan [ivan.london@bclplaw.com]; lbowman@axpc.org; Andrew Casper [casper@ooga.org]; Mike Hightower [mmhightower@q.com]; Benevento, Douglas [benevento.douglas@epa.gov]; Jon Goldstein [jgoldstein@edf.org]; Jennifer McQueen [jmcqueen@finleyresources.com]
Subject: Final Report - Summary of Input on Oil and Gas Extraction Wastewater Management Practices Under the Clean Water Act

Good afternoon,

Today, May 11, EPA released a final report titled "Summary of Input on Oil and Gas Extraction Wastewater Management Practices Under the Clean Water Act." The report is an update to EPA's May 2019 draft report summarizing input from stakeholders regarding management of produced water from onshore oil and gas extraction activities. The final report provides updated information reflecting input received from states, tribes and stakeholders. The Agency is still determining what, if any, next steps should be taken regarding produced water management under the Clean Water Act. The final report and other related information will be available on EPA's website at: www.epa.gov/eg/study-oil-and-gas-extraction-wastewater-management.

Apologies if this email is duplicative from a previous message you received from the Agency.

Hope you are safe and well,

Megan

Megan E. Garvey
Senior Counselor
Office of the Administrator
U.S. Environmental Protection Agency
Cell: Ex. 6 Personal Privacy (PP)

Message

From: Garvey, Megan [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7623E34F292C43ECBB4B01555594B604-GARVEY, MEG]
Sent: 3/27/2020 6:35:32 PM
To: Garvey, Megan [garvey.megan@epa.gov]
BCC: Matthew Todd [toddm@theenvironmentalpartnership.org]; 'Kathleen Sgamma' [ksgamma@westernenergyalliance.org]; Greg Schrab [gschrab@sm-energy.com]; Jesse Sandlin [Jesse.Sandlin@nblenergy.com]; 'Maggi Young' [maggi.young@chk.com]; Rikki hrenko-browning [rhrenko-browning@utahpetroleum.org]; bthompson@axpc.us; Christy Woodward [christy.woodward@coga.org]; 'Djordan@newfield.com' [Djordan@newfield.com]; bergt@aoga.org; Patrick Padilla (patrick_padilla@eogresources.com) [patrick_padilla@eogresources.com]; Ryan Steadley [steadley@strongerinc.org]; Stephanie Meadows [Meadows@api.org]; Smythe Anderson [AndersonS@api.org]; dick.francis@shell.com; Wendy Kirchoff [Wendy.Kirchoff@nblenergy.com]; lfuller@ipaa.org; Jacus, John [John.Jacus@dgslaw.com]; lwrotenbery@iogcc.state.ok.us; shea.loper@ovintiv.com; Jennifer Biever [jbiever@lewisbess.com]; Eric P. Waeckerlin [EPWaeckerlin@hollandhart.com]; London, Ivan [ivan.london@bclplaw.com]
Subject: FW: EPA Announces Steps to Protect the Availability of Gasoline during COVID-19 Pandemic

Good afternoon,

The following EPA press release from today may be of interest to you.

From: EPA Press Office <press@epa.gov>
Sent: Friday, March 27, 2020 12:00 PM
To: Garvey, Megan <garvey.megan@epa.gov>
Subject: EPA Announces Steps to Protect the Availability of Gasoline during COVID-19 Pandemic

---

EPA Announces Steps to Protect the Availability of Gasoline during COVID-19 Pandemic

WASHINGTON (March 27, 2020) — Today, the U.S. Environmental Protection Agency (EPA) announced several steps the Agency is taking to protect the Nation's gasoline supply in response to the COVID-19 pandemic.

EPA intends to provide additional flexibility to the marketplace to transition from winter-grade, high volatility gasoline to summer-grade low vapor pressure gasoline. Due to the steep fall-off in gasoline demand as a result of the COVID-19 pandemic, gasoline storage capacity is limited and more time is needed to transition the distribution system in order to come into compliance for the summer driving season. EPA will temporarily waive the summer low volatility requirements and blending limitations for gasoline.

Without a waiver of the summer gasoline requirements, parties upstream of retailers and wholesale purchasers would be required to stop selling the winter gasoline sitting in their storage tanks on May 1, 2020, which would prevent them from loading summer gasoline into the storage tanks, resulting in a shortage of gasoline. By waiving the low volatility and blending limitations through May 20, 2020, EPA will ensure a steady supply of gasoline. EPA will continue to monitor the adequacy of gasoline supplies and, should conditions warrant, may modify or extend this waiver at a later date.

Additionally, EPA does not intend to unilaterally revisit or rescind any previously granted small refinery exemptions issued for prior compliance years. As noted in the temporary policy on *COVID-19 Implications for EPA's Enforcement and Compliance Assurance Program*, issued yesterday, EPA is focused on protecting our employees and ensuring continued protection of public health and the environment from acute or imminent threats during the COVID-19 pandemic. Therefore, investigating and initiating enforcement actions against small refineries that were previously subject to an exemption is a low priority for the agency. EPA intends to develop an appropriate implementation and enforcement response to the Tenth Circuit's decision in *RFA v. EPA* once appeals have been resolved and the court's mandate has been issued.

Finally, in a forthcoming action, EPA intends to extend the RFS compliance date for small refineries to provide them with additional flexibility.

Visit The EPA's Newsroom

U.S. Environmental Protection Agency
1200 Pennsylvania Avenue Northwest
Washington, D.C. 20004

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Message

From: Garvey, Megan [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7623E34F292C43ECBB4B01555594B604-GARVEY, MEG]
Sent: 3/26/2020 8:29:51 PM
To: Garvey, Megan [garvey.megan@epa.gov]
BCC: 'Matthew Todd' [toddm@theenvironmentalpartnership.org]; 'Kathleen Sgamma' [ksgamma@westernenergyalliance.org]; 'Greg Schrab' [gschrab@sm-energy.com]; 'Jesse Sandlin' [Jesse.Sandlin@nblenergy.com]; 'Maggi Young' [maggi.young@chk.com]; 'Rikki hrenko-browning' [rhrenko-browning@utahpetroleum.org]; 'bthompson@axpc.us' [bthompson@axpc.us]; 'Christy Woodward' [christy.woodward@coga.org]; 'Djordan@newfield.com' [Djordan@newfield.com]; 'bergt@aoga.org' [bergt@aoga.org]; Patrick Padilla (patrick_padilla@eogresources.com) [patrick_padilla@eogresources.com]; Ryan Steadley [steadley@strongerinc.org]; Stephanie Meadows [Meadows@api.org]; Smythe Anderson [AndersonS@api.org]; dick.francis@shell.com; Wendy Kirchoff [Wendy.Kirchoff@nblenergy.com]; lfuller@ipaa.org; Jacus, John [John.Jacus@dgslaw.com]; lwrotenbery@iogcc.state.ok.us; shea.loper@ovintiv.com; Jennifer Biever [jbiever@lewisbess.com]; Eric P. Waeckerlin [EPWaeckerlin@hollandhart.com]
Subject: FW: EPA Announces Enforcement Discretion Policy for COVID-19 Pandemic

Good afternoon,

Re-circulating today's press release and link to EPA's temporary policy regarding Agency enforcement of environmental legal obligations during the COVID-19 pandemic.

I hope you all are well.

Thanks, Megan

Megan E. Garvey
Senior Counselor
Office of the Administrator
U.S. Environmental Protection Agency
Work: 303.312.6192 | Cell: Ex. 6 Personal Privacy (PP)

From: EPA Press Office <press@epa.gov>
Sent: Thursday, March 26, 2020 2:04 PM
To: Garvey, Megan <garvey.megan@epa.gov>
Subject: EPA Announces Enforcement Discretion Policy for COVID-19 Pandemic

EPA Announces Enforcement Discretion Policy for COVID-19 Pandemic

WASHINGTON (March 26, 2020) — The U.S. Environmental Protection Agency (EPA) is mindful of the health and safety of the public, as well as our staff, and those of Federal Agencies, State and Local Governments, Tribes, Regulated Entities, Contractors, and Non-governmental Organizations during the COVID-19 pandemic. The agency is taking these important considerations into account as we all continue our work to protect human health and the environment. Accordingly, EPA is announcing a temporary policy regarding EPA enforcement of environmental legal obligations during the COVID-19 pandemic.

EPA's temporary enforcement discretion policy applies to civil violations during the COVID-19 outbreak. The policy addresses different categories of noncompliance

differently. For example, under the policy EPA does not expect to seek penalties for noncompliance with routine monitoring and reporting obligations that are the result of the COVID-19 pandemic but does expect operators of public water systems to continue to ensure the safety of our drinking water supplies. The policy also describes the steps that regulated facilities should take to qualify for enforcement discretion.

"EPA is committed to protecting human health and the environment, but recognizes challenges resulting from efforts to protect workers and the public from COVID-19 may directly impact the ability of regulated facilities to meet all federal regulatory requirements," **said EPA Administrator Andrew Wheeler.** "This temporary policy is designed to provide enforcement discretion under the current, extraordinary conditions, while ensuring facility operations continue to protect human health and the environment."

The temporary policy makes it clear that EPA expects regulated facilities to comply with regulatory requirements, where reasonably practicable, and to return to compliance as quickly as possible. To be eligible for enforcement discretion, the policy also requires facilities to document decisions made to prevent or mitigate noncompliance and demonstrate how the noncompliance was caused by the COVID-19 pandemic.

This policy does not provide leniency for intentional criminal violations of law.

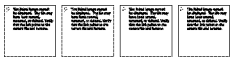
The policy does not apply to activities that are carried out under Superfund and RCRA Corrective Action enforcement instruments. EPA will address these matters in separate communications.

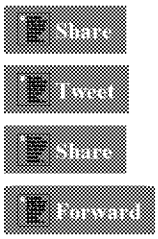
EPA's policy will apply retroactively beginning on March 13, 2020. EPA will assess the continued need for and scope of this temporary policy on a regular basis and will update it if EPA determines modifications are necessary. In order to provide fair and sufficient notice to the public, EPA will post a notification here at least 7 days prior to terminating this temporary policy.

To read the EPA Policy on Enforcement during the COVID-19 outbreak: https://www.epa.gov/enforcement/enforcement-policy-guidance-publications.

Members of the public can help protect our environment by identifying and reporting environmental violations. Learn more here: https://www.epa.gov/enforcement/report-environmental-violation-general-information.

Visit The EPA's Newsroom





U.S. Environmental Protection Agency
1200 Pennsylvania Avenue Northwest
Washington, D.C. 20004

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Message

From: Garvey, Megan [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7623E34F292C43ECBB4B01555594B604-GARVEY, MEG]
Sent: 2/19/2020 10:54:06 PM
To: Kate Pinson [kpinson@westernenergyalliance.org]
Subject: RE: Wednesday

Thanks for understanding, Kate. Stay warm / travel safe in this weather. Megan

Megan E. Garvey
Senior Counselor
Ex. 6 Personal Privacy (PP)

-----Original Message-----
From: Kate Pinson <kpinson@westernenergyalliance.org>
Sent: Wednesday, February 19, 2020 8:05 AM
To: Garvey, Megan <garvey.megan@epa.gov>
Subject: Re: Wednesday

No worries, Megan! I'm happy to reschedule for late March or early April. I should be around and pretty flexible so let's plan around your schedule.

I'll respond separately to the other items in the message and cc Jag.

Thanks,
Kate

> On Feb 18, 2020, at 6:27 AM, Garvey, Megan <garvey.megan@epa.gov> wrote:
>
> Good morning, Kate,
>
> I now have a conflict on Wednesday morning and need to cancel our coffee date. Sorry for the change in plans. I am out of town for the majority of the next three weeks, so let's try to reschedule for late March or early April. Copying Jag and I suggest you guys touch base in the meantime if you haven't already.
>
> Also, we'll work on a response to WEA's comment on the Oil and Gas Audit Program. Is WEA interested in a meeting to discuss concerns face to face? Let me know and we can set something up with OECA and Region 8.
>
> Thanks, Megan
>

Message

From: Garvey, Megan [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7623E34F292C43ECBB4B01555594B604-GARVEY, MEG]
Sent: 2/10/2020 5:59:31 PM
To: Kate Pinson [kpinson@westernenergyalliance.org]; Sethuraman, Jag [Sethuraman.Jag@epa.gov]
CC: Greg Schrab [gschrab@sm-energy.com]
Subject: RE: Western Energy Alliance New Owner Audit Feedback Comments

Thanks, Kate and Greg. We will review and share internally.

Per my recent conversation with Kate, Apple is no longer with EPA. Tim Sullivan and Greg Fried are the OECA points of contact on the audit programs. Contact information below.

Gregory Fried (fried.gregory@epa.gov, Tel. 202-564-7016)
Tim Sullivan (sullivan.tim@epa.gov, Tel. 303-312-6196)

Megan

Megan E. Garvey
Senior Counselor
Office of the Administrator
U.S. Environmental Protection Agency
Work: 303.312.6192 | Cell: Ex. 6 Personal Privacy (PP)

From: Kate Pinson <kpinson@westernenergyalliance.org>
Sent: Monday, February 10, 2020 9:31 AM
To: Sethuraman, Jag <Sethuraman.Jag@epa.gov>; Garvey, Megan <garvey.megan@epa.gov>
Cc: Greg Schrab <gschrab@sm-energy.com>
Subject: Western Energy Alliance New Owner Audit Feedback Comments

Hello,

Greg Schrab asked me to pass on Western Energy Alliance's comments on the Oil and Gas New Owner Program Questions and Answers document that we sent over on January 27th. I have also attached an electronic copy of the condensed document that OECA provided to TCEQ that is referenced in our comments.

Thank you for considering our feedback.

Kate Noble Pinson
Regulatory Analyst
Western Energy Alliance
1775 Sherman St., Suite 2700
Denver, CO 80203
Personal Phone / Ex. 6 ct
(303) 623-0987 main
kpinson@westernenergyalliance.org
westernenergyalliance.org

Message

From: Garvey, Megan [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7623E34F292C43ECBB4B01555594B604-GARVEY, MEG]
Sent: 2/10/2020 5:56:30 PM
To: Kate Pinson [kpinson@westernenergyalliance.org]
Subject: FW: EPA's Existing Owner Clean Air Act Audit Program for Oil and Gas

Megan E. Garvey
Senior Counselor
Ex. 6 Personal Privacy (PP)

From: Garvey, Megan
Sent: Friday, December 20, 2019 1:50 PM
To: Garvey, Megan <garvey.megan@epa.gov>
Cc: Sullivan, Tim <Sullivan.Tim@epa.gov>; Fried, Gregory <Fried.Gregory@epa.gov>; Mia, Marcia <Mia.Marcia@epa.gov>; Hull, George <Hull.George@epa.gov>
Subject: EPA's Existing Owner Clean Air Act Audit Program for Oil and Gas

Good morning, EPA stakeholders and co-regulators,

Yesterday, EPA finalized an **Existing Owner Clean Air Act Audit Program** tailored for the oil and natural gas sector. The program encourages existing owners to voluntarily find, correct and self-disclose Clean Air Act violations. The EPA believes that the program will accelerate the rate at which participating operators identify and correct emissions violations, resulting in significant pollutant reductions and increased environmental protection.

EPA's Press Release and the Oil and Natural Gas Existing Owner Audit Program Implementation Memo and Standard Agreement/Template are available here.

Please contact Gregory Fried (fried.gregory@epa.gov, Tel. 202-564-7016), Tim Sullivan (sullivan.tim@epa.gov, Tel. 303-312-6196) or me with questions.

Recall that EPA released an Audit Program for New Owners/Operators of oil and natural gas facilities earlier this year (March, 2019). Additional information regarding the New Owner/Operator program can be found here.

Please share this email with your colleagues and peers.

Thank you. Have a happy and safe holiday season, Megan

Megan E. Garvey
Senior Counselor
Office of the Administrator
U.S. Environmental Protection Agency
Work: 303.312.6192 | Cell: Ex. 6 Personal Privacy (PP)

Message

From: Garvey, Megan [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7623E34F292C43ECBB4B01555594B604-GARVEY, MEG]
Sent: 1/8/2020 1:16:32 PM
To: Lee Fuller [lfuller@ipaa.org]
Subject: RE: EPA's Existing Owner Clean Air Act Audit Program for Oil and Gas

Good morning, Lee,

Will you please send me your phone number?

Thanks, Megan

Megan E. Garvey
Senior Counselor
Ex. 6 Personal Privacy (PP)

From: Lee Fuller <lfuller@ipaa.org>
Sent: Sunday, January 5, 2020 5:25 PM
To: Garvey, Megan <garvey.megan@epa.gov>
Subject: Re: EPA's Existing Owner Clean Air Act Audit Program for Oil and Gas

Thanks Megan.

Sent from my iPhone

On Jan 5, 2020, at 5:13 PM, Garvey, Megan <garvey.megan@epa.gov> wrote:

Hi, Lee,

Hope you are having a nice weekend. I understand your concerns and I heard from industry when the New Owner Audit Program was released early last year about some similar concerns. I'll give you a call early this week to chat, provide EPA's perspective and talk about a solution.

Thanks, Megan

Megan E. Garvey
Senior Counselor
Ex. 6 Personal Privacy (PP)

From: Lee Fuller <lfuller@ipaa.org>
Sent: Friday, January 3, 2020 11:58 AM
To: Garvey, Megan <garvey.megan@epa.gov>
Subject: RE: EPA's Existing Owner Clean Air Act Audit Program for Oil and Gas

Thanks for following up.

My main concern here relates to the issues industry had with the initial self-audit package regarding storage vessels. It is compounded by the dynamics associated with the Subpart OOOOa Reconsideration. As I understand the self-audit package, for a facility to qualify it must essentially commit to apply storage vessel controls that exceed our interpretation of the current Subpart OOOOa requirements, may be closer to the proposed Subpart OOOOa reconsideration requirements, but may differ from what may finally be included in the Subpart OOOOa reconsideration. For existing facility owners to impose such an expanded regulatory program on themselves – particularly if they are beyond what will be required for new sources in the final regulatory structure – doesn't seem to make the self-audit appealing.

It's hard for me as a trade association to suggest that this process is a value to existing owners under that scenario. Am I misreading the essentials?

Lee

From: Garvey, Megan <garvey.megan@epa.gov>
Sent: Tuesday, December 31, 2019 4:11 PM
To: Lee Fuller <lfuller@ipaa.org>
Subject: RE: EPA's Existing Owner Clean Air Act Audit Program for Oil and Gas

Talk to you then. I am also in town the week of Jan. 6 and Jan. 21 if you want to meet in person. Happy New Year.

Megan E. Garvey
Senior Counselor
Ex. 6 Personal Privacy (PP)

From: Lee Fuller <lfuller@ipaa.org>
Sent: Tuesday, December 31, 2019 2:10 PM
To: Garvey, Megan <garvey.megan@epa.gov>
Subject: Re: EPA's Existing Owner Clean Air Act Audit Program for Oil and Gas

Thanks, Megan. I'll follow up next year.

Sent from my iPhone

> On Dec 31, 2019, at 3:35 PM, Garvey, Megan <garvey.megan@epa.gov> wrote:
>
> Hi, Lee,
>
> Sorry for my delay. The existing owner policy is very similar to the new owner policy – in that it targets excess emissions from production equipment like the new owner policy does. Happy to chat further about any concerns.

Happy new year, Megan

Megan E. Garvey
Senior Counselor
Ex. 6 Personal Privacy (PP)

From: Lee Fuller <lfuller@ipaa.org>
Sent: Monday, December 23, 2019 11:48 AM
To: Garvey, Megan <garvey.megan@epa.gov>
Subject: RE: EPA's Existing Owner Clean Air Act Audit Program for Oil and Gas

Megan,

Is this the same new owner self-audit policy applied to existing owners or does it provide some different options? As you will recall, a key issue in the self-audit policy related to it provisions on storage tanks in particular which has also been an issue with the Subpart OOOOa reconsideration.

Thanks,

Lee Fuller

From: Garvey, Megan <garvey.megan@epa.gov>
Sent: Friday, December 20, 2019 3:50 PM
To: Garvey, Megan <garvey.megan@epa.gov>
Cc: Sullivan, Tim <Sullivan.Tim@epa.gov>; Fried, Gregory <Fried.Gregory@epa.gov>; Mia, Marcia <Mia.Marcia@epa.gov>; Hull, George <Hull.George@epa.gov>
Subject: EPA's Existing Owner Clean Air Act Audit Program for Oil and Gas

Good morning, EPA stakeholders and co-regulators,

Yesterday, EPA finalized an **Existing Owner Clean Air Act Audit Program** tailored for the oil and natural gas sector. The program encourages existing owners to voluntarily find, correct and self-disclose Clean Air Act violations. The EPA believes that the program will accelerate the rate at which participating operators identify and correct emissions violations, resulting in significant pollutant reductions and increased environmental protection.

EPA's Press Release and the Oil and Natural Gas Existing Owner Audit Program Implementation Memo and Standard Agreement/Template are available here.

Please contact Gregory Fried (fried.gregory@epa.gov, Tel. 202-564-7016), Tim Sullivan (sullivan.tim@epa.gov, Tel. 303-312-6196) or me with questions.

Recall that EPA released an Audit Program for New Owners/Operators of oil and natural gas facilities earlier this year (March, 2019). Additional information regarding the New Owner/Operator program can be found here.

Please share this email with your colleagues and peers.

Thank you. Have a happy and safe holiday season, Megan

Megan E. Garvey
Senior Counselor
Office of the Administrator
U.S. Environmental Protection Agency
Work: 303.312.6192 | Cell: Ex. 6 Personal Privacy (PP)

Message

From: Garvey, Megan [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7623E34F292C43ECBB4B01555594B604-GARVEY, MEG]
Sent: 12/31/2019 9:10:42 PM
To: Lee Fuller [lfuller@ipaa.org]
Subject: RE: EPA's Existing Owner Clean Air Act Audit Program for Oil and Gas

Talk to you then. I am also in town the week of Jan. 6 and Jan. 21 if you want to meet in person. Happy New Year.

Megan E. Garvey
Senior Counselor
Ex. 6 Personal Privacy (PP)

From: Lee Fuller <lfuller@ipaa.org>
Sent: Tuesday, December 31, 2019 2:10 PM
To: Garvey, Megan <garvey.megan@epa.gov>
Subject: Re: EPA's Existing Owner Clean Air Act Audit Program for Oil and Gas

Thanks, Megan. I'll follow up next year.

Sent from my iPhone

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Hi, Lee,

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Happy new year, Megan

Megan E. Garvey
Senior Counselor
Ex. 6 Personal Privacy (PP)

From: Lee Fuller <lfuller@ipaa.org>
Sent: Monday, December 23, 2019 11:48 AM
To: Garvey, Megan <garvey.megan@epa.gov>
Subject: RE: EPA's Existing Owner Clean Air Act Audit Program for Oil and Gas

Megan,

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Thanks,

Lee Fuller

From: Garvey, Megan <garvey.megan@epa.gov>
Sent: Friday, December 20, 2019 3:50 PM
To: Garvey, Megan <garvey.megan@epa.gov>
Cc: Sullivan, Tim <Sullivan.Tim@epa.gov>; Fried, Gregory <Fried.Gregory@epa.gov>; Mia, Marcia <Mia.Marcia@epa.gov>; Hull, George <Hull.George@epa.gov>
Subject: EPA's Existing Owner Clean Air Act Audit Program for Oil and Gas

Good morning, EPA stakeholders and co-regulators,

Yesterday, EPA finalized an **Existing Owner Clean Air Act Audit Program** tailored for the oil and natural gas sector. The program encourages existing owners to voluntarily find, correct and self-disclose Clean Air Act violations. The EPA believes that the program will accelerate the rate at which participating operators identify and correct emissions violations, resulting in significant pollutant reductions and increased environmental protection.

EPA's Press Release and the Oil and Natural Gas Existing Owner Audit Program Implementation Memo and Standard Agreement/Template are available here.

Please contact Gregory Fried (fried.gregory@epa.gov, Tel. 202-564-7016), Tim Sullivan (sullivan.tim@epa.gov, Tel. 303-312-6196) or me with questions.

Recall that EPA released an Audit Program for New Owners/Operators of oil and natural gas facilities earlier this year (March, 2019). Additional information regarding the New Owner/Operator program can be found here.

Please share this email with your colleagues and peers.

Thank you. Have a happy and safe holiday season, Megan

Megan E. Garvey
Senior Counselor
Office of the Administrator
U.S. Environmental Protection Agency
Work: 303.312.6192 | Cell: Ex. 6 Personal Privacy (PP)

Message

From: Garvey, Megan [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7623E34F292C43ECBB4B01555594B604-GARVEY, MEG]
Sent: 12/31/2019 8:35:10 PM
To: Lee Fuller [lfuller@ipaa.org]
Subject: RE: EPA's Existing Owner Clean Air Act Audit Program for Oil and Gas

Hi, Lee,

Sorry for my delay. The existing owner policy is very similar to the new owner policy – in that it targets excess emissions from production equipment like the new owner policy does. Happy to chat further about any concerns.

Happy new year, Megan

Megan E. Garvey
Senior Counselor
Ex. 6 Personal Privacy (PP)

From: Lee Fuller <lfuller@ipaa.org>
Sent: Monday, December 23, 2019 11:48 AM
To: Garvey, Megan <garvey.megan@epa.gov>
Subject: RE: EPA's Existing Owner Clean Air Act Audit Program for Oil and Gas

Megan,

Is this the same new owner self-audit policy applied to existing owners or does it provide some different options? As you will recall, a key issue in the self-audit policy related to it provisions on storage tanks in particular which has also been an issue with the Subpart OOOOa reconsideration.

Thanks,

Lee Fuller

From: Garvey, Megan <garvey.megan@epa.gov>
Sent: Friday, December 20, 2019 3:50 PM
To: Garvey, Megan <garvey.megan@epa.gov>
Cc: Sullivan, Tim <Sullivan.Tim@epa.gov>; Fried, Gregory <Fried.Gregory@epa.gov>; Mia, Marcia <Mia.Marcia@epa.gov>; Hull, George <Hull.George@epa.gov>
Subject: EPA's Existing Owner Clean Air Act Audit Program for Oil and Gas

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Message

From: Garvey, Megan [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7623E34F292C43ECBB4B01555594B604-GARVEY, MEG]
Sent: 12/20/2019 8:50:22 PM
To: Garvey, Megan [garvey.megan@epa.gov]
CC: Sullivan, Tim [Sullivan.Tim@epa.gov]; Fried, Gregory [Fried.Gregory@epa.gov]; Mia, Marcia [Mia.Marcia@epa.gov]; Hull, George [Hull.George@epa.gov]
BCC: aduran@pojoaque.org; alan.hatch@santaana-nsn.gov; alicia.boss@nebraska.gov; allan.brockenbrough@deq.virginia.gov; allison.mclaughlin@quinault.org; amatheson@utah.gov; Amy Childers [amy.childers@iogcc.state.ok.us]; andy.bessler@nau.edu; andy.werk@ftbelknap.org; ann.lowery@state.ma.us; atwobears@standingrock.org; Baker Allen [baker.allen@governor.alabama.gov]; Ben Grumbles [ben.grumbles@maryland.gov]; bfield@nycap.rr.com; Bill.Bartling@conservation.ca.gov; bpargeets@utetribe.com; brandy.valdezmurphy@state.co.us; Butch.Lambert@dmme.virginia.gov; CAtcitty@taospueblo.com; catherine.dickert@dec.ny.gov; ccain@nd.gov; chairmanfox@mhanation.com; chona.sarte@calepa.ca.gov; chood@mhanation.com; Chris.vierrether@dnr.mo.gov; Christi.craddick@rrc.texas.gov; chrisw@weiser-brown.com; chuck.brown@la.gov; Ex. 6 Personal Privacy (PP) ; cnaha@kewa-nsn.us; colin.mckee1@wyo.gov; craig.butler@epa.ohio.gov; csage@southernute-nsn.gov; Ex. 6 Personal Privacy (PP) dallas_baker@deq.state.ms.us; dan.seamount@alaska.gov; danyaibe@ZiaPueblo.org; David Bunn [dbunn@conservation.ca.gov]; david.paylor@deq.virginia.gov; dean.goggles@northernarapaho.org; deborah.wells@la.gov; Dennis Burling [dennis.burling@nebraska.gov]; dglatt@nd.gov; dinoc@santaclarapueblo.org; dmartinez@puebloofacoma.org; donbenn@navajo-nsn.gov; donna.fisher@ks.gov; Dwight Keen [d.keen@kcc.ks.gov]; ed.larrimore@maryland.gov; edmundbaker@mhanation.com; ee@ee.ok.gov; elsie.franklin@deq.virginia.gov; environment_picurispueblo.org [environment@picurispueblo.org]; ethamke@mt.gov; eugeniaquintana@navajo-nsn.gov; fazure@fortpecktribes.net; fitchh@michigan.gov; gary burdette [Gary.C.Burdette@wv.gov]; gary.baughman@state.co.us; Gary.Ross@la.gov; gjojola@lagunapueblo-nsn.gov; grant.cope@calepa.ca.gov; Ex. 6 Personal Privacy (PP) Hall, Richard [Hall.Richard@epa.gov]; Hannah.Phan@iogcc.state.ok.us; Harry Birdwell [harry.birdwell@clo.ok.gov]; hcuthair@utemountain.org; info@standingrock.org; inperce@ftbelknap.org; jacob_pecos@pueblodecochiti.org; Jarrett, James F [James.F.Jarrett@wv.gov]; james.a.martin@wv.gov; Jann, Stephen [jann.stephen@epa.gov]; jannhayman@osagenation-nsn.gov; jbarkley@mdeq.ms.gov; jchambers@mt.gov; jeffrey.fretwell@maryland.gov; jennifer.hower@state.nm.us; Jesse.D.Adkins@wv.gov; jesshirley@pa.gov; jgadret@westar.org; Jim Halvorson [jhalvorson@mt.gov]; jim.macy@nebraska.gov; jmpotter@utah.gov; Joe.Francis@nebraska.gov; john.wood@ferc.gov; johnbaza@utah.gov; jstefanko@pa.gov; julie.murphy@state.co.us; justin.hsu@maryland.gov; Jwilliams@nccommerce.com; kara.valentine@nebraska.gov; ken.harris@conservation.ca.gov; Kenneth.B.Taylor@ncdenr.gov; Kim Christy [kimchristy@utah.gov]; kira.gillette@state.co.us; Klemp, David [DKlemp@mt.gov]; Kristen Hendricks [Kristen.Hendricks@state.sd.us]; Krystal Rudolph [krudolph@mdeq.ms.gov]; lacey.hardin@tn.gov; larry.phillips@ohkay.org; larry.pierce@dnr.mo.gov; Larryc.taylor@ky.gov; laura.finley@deq.ok.gov; laurie.stevenson@epa.ohio.gov; Ex. 6 Personal Privacy (PP) ; Lawrence Bengal [larry.bengal@aogc.state.ar.us]; lawrenced6@michigan.gov; lboliver@nd.gov; aneatkinso@pa.gov; ldorman@pa.gov; leah.martland@state.co.us; leo.henning@ks.gov; lhelms@nd.gov; Lia Parisien [lparisien@ecos.org]; Ex. 6 Personal Privacy (PP) ; lloyd.kirk@deq.ok.gov; Loraine Cory [loraine.cory@conservation.ca.gov]; luked@utetribe.com; lvetter@standingrock.org Ex. 6 Personal Privacy (PP) ; marian.mergist@la.gov; mark.jones@state.nm.us; mark.watson@wyo.gov; marty.link@nebraska.gov; Mary Uhl [maryuhl@westar.org]; mhutson@southernute-nsn.gov; Michael McClellan [MCCLELLANM1@michigan.gov]; michael.abraczinskas@ncdenr.gov; michael.dowd@deq.virginia.gov; michelle.b.walker@tn.gov; michelle.hunter_state.nm.us [michelle.hunter@state.nm.us]; Mick Thomas [mthomas@idl.idaho.gov]; Miesbach, David [david.miesbach@nebraska.gov]; dan.brennan@illinois.gov; mpaque@gwpc.org; mvisher@minerals.nv.gov; mwallen@mhp.energy; nancy.vehr1@wyo.gov; nathan.graber@dec.ny.gov; ntew@gsa.state.al.us; Ex. 6 Personal Privacy (PP) onotsinneh@janadmin.com; ootc@osagenation-nsn.gov; Homer, Pamela, NMENV [Pamela.Homer2@state.nm.us]; paul.clarke@jemezpueblo.org; pawilson@easternshoshone.org; phillip.goetze@state.nm.us; pmcdonnell@pa.gov; POI36871@Isletapueblo.com; pstout@sfpueblo.com; r.hoffman_kcc.ks.gov [r.hoffman@kcc.ks.gov]; Rachael.Tadlock@conservation.ca.gov; ralph.gruebel@state.nm.us; Rene Stucky [r.stucky@kcc.ks.gov]; Richard.Ieyoub@la.gov; Rick Calhoon [bbiard@pruet.com]; Rick Cooper [rick.cooper@dmme.virginia.gov]; rick.simmers@dnr.state.oh.us; rmartinez@sanipueblo.org; rmperry@minerals.nv.gov; robert.hodanbosi@epa.ohio.gov; ronald.price@ky.gov; ronaldw@utetribe.com; rretherford@dnr.in.gov; russellbegaye@navajo-nsn.gov; ryan.channell@ncdenr.gov; sclow@utemountain.org; Dawson, Scott, EMNRD [Scott.Dawson@state.nm.us]; scott.g.mandirola@wv.gov; scott.kudlas@deq.virginia.gov; scott.thompson@deq.ok.gov; scperry@pa.gov; sean.hackett@state.co.us; sectyrodriquez@calepa.ca.gov; Shane

Khoury [shane.khoury@aogc.state.ar.us]; Sheila Holman [sheila.holman@ncdenr.gov]; shelly.lemon@state.nm.us; smountainflower [smountainflower@sandiapueblo.nsn.us]; srydeen@nambepueblo.org; steve.goans@nebraska.gov; sthomas@mt.gov; tami.mcmullin@state.co.us; tammy.parker@ashiwi.org; tbetz@pa.gov; tbonnette@tunica.org; tegan.treadaway@la.gov; tiffani.kavalec@epa.ohio.gov; Ex. 6 Personal Privacy (PP); timothya.taylor@state.co.us; todd.parfitt@wyo.gov; Tom Moore [tmoore@westar.org]; tom.higgins@state.mn.us; tonys@utetribe.com; tracy.davis@ncdenr.gov; vickie.woods@ncdenr.gov; Wayne Christian [wayne.christian@rrc.texas.gov]; wcaefta@wibauxcounty.net; Weeks, Ashley Ex. 6 Personal Privacy (PP); William Sydow [bsydow@nogcc.ne.gov]; william.lynn@osagenation-nsn.gov; woodenergy@sbcglobal.net; wyganta@michigan.gov; yana.garcia@calepa.ca.gov; Will Toor [will.toor@state.co.us]; Lori Wrotenbery [LWrotenbery@iogcc.state.ok.us]; Richard.Simmers@dnr.state.oh.us; David.Bunn@conservation.ca.gov; Lisa Lone Fight [lhlonefight@mhanation.com]; Pete Breuer [pbreuer@jf3law.com]; Papageorgiou, Ona P (DEC [ona.papageorgiou@dec.ny.gov]; adrienne.sandoval@state.nm.us; gabriel.wade@state.nm.us; Vinson, Toby [toby.vinson@ncdenr.gov]; Michael.Hopkins@epa.ohio.gov; Dena.Wojtach@state.co.us; john.putnam@state.co.us; Julia.Pickle@governor.alabama.gov Ex. 6 Personal Privacy (PP) ceverett@mhanation.com; bill.paul@maryland.gov; Lynne_chastain-carpenter@ios.doi.gov; ksgamma@westernenergyalliance.org; Smythe Anderson [AndersonS@api.org]; Matthew Todd [toddm@theenvironmentalpartnership.org]; Jones, Doug [jones.doug@epa.gov]; Zivkovich, Angela [Angela.Zivkovich@anadarko.com]; Greg Schrab [gschrab@sm-energy.com]; Jesse Sandlin [Jesse.Sandlin@nblenergy.com]; 'Maggi Young' [maggi.young@chk.com]; Rikki hrenko-browning [rhrenko-browning@utahpetroleum.org]; bthompson@axpc.us; Benevento, Douglas [benevento.douglas@epa.gov]; Christy Woodward [christy.woodward@coga.org]; Pratt, Karen [Karen_Pratt@xtoenergy.com]; 'Djordan@newfield.com' [Djordan@newfield.com]; Eric P. Waeckerlin [EPWaeckerlin@hollandhart.com]; bergt@aoga.org; Patrick Padilla (patrick_padilla@eogresources.com) [patrick_padilla@eogresources.com]; lwrotenbery@iogcc.state.ok.us; Ryan Steadley [steadley@strongerinc.org]; Lee Fuller [lfuller@ipaa.org]; Coxen, Carrie [coxen.carrie@epa.gov]

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Megan E. Garvey
Senior Counselor
Office of the Administrator
U.S. Environmental Protection Agency
Work: 303.312.6192 | Cell: Ex. 6 Personal Privacy (PP)

Message

From: Garvey, Megan [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7623E34F292C43ECBB4B01555594B604-GARVEY, MEG]
Sent: 10/1/2019 8:38:06 PM
To: Jagadeesan Sethuraman [Jagadeesan.Sethuraman@whiting.com]
CC: Gretchen Kern (gretchen.kern@pxd.com) (gretchen.kern@pxd.com) [gretchen.kern@pxd.com]; Stuart Siffring [ssiffring@westernenergyalliance.org]; Sanchez, Jessica M. (MRO) [jmsanchez@marathonoil.com]; Lee Fuller [lfuller@ipaa.org]
Subject: Re: Meeting on the proposed NSPS OOOOa Technical Rule

Hi, Jag,

Thank you for the email and invitation to meet. I am available next Tuesday at 1p. Look forward to the conversation.

Megan

Sent from my iPhone

On Oct 1, 2019, at 8:49 AM, Jagadeesan Sethuraman <Jagadeesan.Sethuraman@whiting.com> wrote:

> Good morning Megan,
>
> Western Energy Alliance, Independent Petroleum Association of America, and American Exploration and Production Council members would like to meet with you to discuss the industry's comments for the proposed NSPS OOOOa Technical Rule. The purpose of this meeting is to review and explain the comments these trades have submitted on this proposed rule. An agenda for the meeting is attached. Our members are available next Tuesday (10/08) at 1:00 P.M. and we hope that this schedule works for you. Please let me know if we need to reschedule this meeting for any reason. We are proposing to meet at the Western Energy Alliance's office. We would appreciate it if you can check your availability and let us at your earliest convenience so that we can let our members know of this meeting.
>
> Thanks,
>
> **Jagadeesan Sethuraman**
> Environmental Manager
> **Whiting Petroleum Corporation**
> ***and its wholly owned subsidiary***
> **Whiting Oil and Gas Corporation**
> 1700 Broadway, Suite 2300
> Denver, CO 80290
> Direct (303) 390-4986
> Cell Ex. 6 Personal Privacy (PP)
> Fax (303) 390-4994
> jagadeesan.sethuraman@whiting.com
> www.whiting.com
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<Joint Trades and EPA NSPS OOOOa Tech Agenda.docx>

Message

From: Garvey, Megan [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7623E34F292C43ECBB4B01555594B604-GARVEY, MEG]
Sent: 9/25/2019 2:21:38 PM
To: Garvey, Megan [garvey.megan@epa.gov]
BCC: Garvey, Megan [garvey.megan@epa.gov]; Matthew Todd [toddm@theenvironmentalpartnership.org]; 'Kathleen Sgamma' [ksgamma@westernenergyalliance.org]; Greg Schrab [gschrab@sm-energy.com]; Jesse Sandlin [Jesse.Sandlin@nblenergy.com]; 'Maggi Young' [maggi.young@chk.com]; Rikki hrenko-browning [rhrenko-browning@utahpetroleum.org]; Siffring, Stuart [ssiffring@westernenergyalliance.org]; bthompson@axpc.us; Benevento, Douglas [benevento.douglas@epa.gov]; Christy Woodward [christy.woodward@coga.org]; Pratt, Karen [Karen_Pratt@xtoenergy.com]; 'Djordan@newfield.com' [Djordan@newfield.com]; Eric P. Waeckerlin [EPWaeckerlin@hollandhart.com]; Jagadeesan Sethuraman [Jagadeesan.Sethuraman@whiting.com]; bergt@aoga.org
Subject: NSPS OOOOa Policy Package in FR and Pigging Compliance Alert

Good morning,

Two announcements:

Yesterday, the Proposed Policy Amendments to the 2012 and 2016 New Source Performance Standards for the Oil and Natural Gas Industry was published in the Federal Register at 84 FR 50244. Public comment closes Nov. 25. Additional information, such as the Oct. 17 Dallas public hearing, and how to comment can be found here.

Today, EPA posted a new Compliance Alert for pigging operations: https://www.epa.gov/enforcement/epa-observes-air-emissions-natural-gas-gathering-operations-violation-clean-air-act

EPA's Office of Enforcement and Compliance Assistance recently identified industry noncompliance due to excess emissions from depressurizing pig launchers and receivers in natural gas gathering operations. Some SIPs require companies to obtain an air permit for the pigging equipment and in most areas a company must determine the mass emissions of pollutants when applying for that permit (or claiming that they are exempt from permitting requirements). The Agency has identified several examples of companies failing to properly calculate the potential for VOC or HAP emissions from pigging operations or otherwise underestimating the mass of pollutants released during pigging operations. The Alert discusses: (1) non-compliance concerns, (2) why pigging is sometimes necessary to efficiently transport gas through a pipeline and how that activity can result in excess emissions, (3) and engineering solutions to address these identified problems.

Please share with your industry peers and other interested stakeholders. Let me know if you have any questions.

Thank you, Megan

Megan E. Garvey
Senior Advisor for Oil and Gas, Regional Management and State Affairs
Office of the Administrator
U.S. Environmental Protection Agency
Work: 303.312.6192 | Cell: Ex. 6 Personal Privacy (PP)

Message

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Sent: 8/9/2019 6:56:31 PM
To: Garvey, Megan [garvey.megan@epa.gov]
BCC: 'Kathleen Sgamma' [ksgamma@westernenergyalliance.org]; Siffring, Stuart [ssiffring@westernenergyalliance.org]; Rikki hrenko-browning [rhrenko-browning@utahpetroleum.org]; Christy Woodward [christy.woodward@coga.org]; bthompson@axpc.us; Jagadeesan Sethuraman [Jagadeesan.Sethuraman@whiting.com]; Greg Schrab [gschrab@sm-energy.com]; Amy Emmert [emmerta@api.org]; Jordan, Doug [Douglas.Jordan@encana.com]; Eric P. Waeckerlin [EPWaeckerlin@hollandhart.com]
Subject: FW: Administrator Wheeler Issues Proposed Rule on Clean Water Act Quality Certification I Charleston, South Carolina

Forwarding today's press release regarding EPA proposed rules to implement CWA Section 401.

Thanks, Megan

Megan E. Garvey
Senior Advisor for Oil and Gas, Regional Management and State Affairs
Office of the Administrator
U.S. Environmental Protection Agency
Work: 303.312.6192 | Cell: Ex. 6 Personal Privacy (PP)

From: EPA Press Office <press@epa.gov>
Sent: Friday, August 9, 2019 10:05 AM
To: Garvey, Megan <garvey.megan@epa.gov>
Subject: Administrator Wheeler Issues Proposed Rule on Clean Water Act Quality Certification I Charleston, South Carolina

Administrator Wheeler Issues Proposed Rule on Clean Water Act Quality Certification In Charleston, South Carolina

Public comment period begins following publication in the Federal Register; public meeting and hearing scheduled for Sept. 5-6, 2019

Charleston, S.C. (August 9, 2019) - Today, the U.S. Environmental Protection Agency (EPA) issued a proposed rule to implement Section 401 of the Clean Water Act (CWA). EPA Administrator Andrew Wheeler made the announcement at the Council of Manufacturing Associations Summer Leadership Conference in Charleston. The proposed rule seeks to increase the transparency and efficiency of the 401 certification process and to promote the timely review of infrastructure projects while continuing to ensure that Americans have clean water for drinking and recreation.

"Under President Trump, the United States has become the number one oil and gas energy producer in the world, while at the same time continuing to improve our air quality," **said EPA Administrator Andrew Wheeler**. "Our proposal is intended to help ensure that states adhere to the statutory language and intent of Clean Water Act. When implemented, this proposal will streamline the process for constructing new energy infrastructure projects that are good for American families, American workers, and the American economy."

In April, President Trump issued an executive order and directed the administration to take appropriate action to accelerate and promote the construction of pipelines and other important energy infrastructure. The president's executive order directs EPA to consult with states and tribes on reviewing and updating guidance and regulations related to Section 401 of the CWA.

Section 401 of the CWA gives states and authorized tribes the authority to assess potential water quality impacts of discharges from federally permitted or licensed infrastructure projects that may affect navigable waters within their borders. The EPA's existing certification rules have not been updated in nearly 50 years and are inconsistent with the text of CWA Section 401, leading to confusion and unnecessary delays for infrastructure projects. With today's action, EPA is proposing to modernize and clarify the timeline and scope of CWA Section 401 certification review and action to be consistent with the plain language of the CWA.

EPA will accept public comment on the proposed rule for 60 days following publication in the Federal Register.

To review the proposed rule and learn more about the CWA Section 401 certification process, see: https://www.epa.gov/cwa-401

Background information:

EPA is proposing this rule in response to President Trump's Executive Order 13868, "Promoting Energy Infrastructure and Economic Growth." EPA was directed to first revise guidance on the CWA Section 401 certification process and then to propose new rules to implement CWA Section 401 by Aug. 8, 2019. EPA engaged in formal consultation with state, local and tribal partners, as well as other federal agencies, to develop this proposed rule. Under the executive order, the EPA is scheduled to finalize this rule in May 2020.

Administrator Wheeler addresses CMA audience.

Administrator Wheeler and NAM President and CEO Jay Timmons.

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U.S. Environmental Protection Agency
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Washington, D.C. 20004

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Message

From: Garvey, Megan [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7623E34F292C43ECBB4B01555594B604-GARVEY, MEG]
Sent: 8/2/2019 2:42:17 AM
To: Garvey, Megan [garvey.megan@epa.gov]
BCC: 'Kathleen Sgamma' [ksgamma@westernenergyalliance.org]; Siffring, Stuart [ssiffring@westernenergyalliance.org]; Rikki hrenko-browning [rhrenko-browning@utahpetroleum.org]; Christy Woodward [christy.woodward@coga.org]; bthompson@axpc.us; Greg Schrab [gschrab@sm-energy.com]; Jagadeesan Sethuraman [Jagadeesan.Sethuraman@whiting.com]
Subject: FW: Proposed Revisions to Clarify New Source Review Permitting Process

Making sure you saw the following EPA press release from today.

Thanks, Megan

Megan E. Garvey
303.312.6192

From: EPA Press Office <press@epa.gov>
Sent: Thursday, August 1, 2019 1:56 PM
To: Garvey, Megan <garvey.megan@epa.gov>
Subject: Proposed Revisions to Clarify New Source Review Permitting Process

Proposed Revisions to Clarify New Source Review Permitting Process

WASHINGTON (August 1, 2019) - Today, the U.S. Environmental Protection Agency (EPA) is proposing a rule to clarify the process for evaluating whether a New Source Review (NSR) preconstruction permit is needed when an existing major-emitting facility plans to make changes or expand.

"Today's proposal is an important step towards President Trump's goal of reforming the elements of NSR that regularly discouraged facilities from upgrading and deploying the latest energy efficient technologies," **said EPA Administrator Andrew Wheeler**. "By simplifying the permitting process and implementing a common-sense interpretation of our NSR rules, we will remove a major obstacle to the construction of cleaner and more efficient facilities."

On March 13, 2018, then Administrator Scott Pruitt issued a guidance memorandum explaining that EPA's current NSR rules were reasonably interpreted to provide that, at the outset of the process to determine NSR applicability, emissions decreases projected to result from a proposed project could be taken into account along with any projected emissions increases. This rule codifies and implements that 2018 guidance memorandum by making minor revisions to the text of the NSR permitting rules, to provide clarity and certainty to the regulated community.

NSR provisions require preconstruction permits when a facility plans to make "major modifications" or otherwise expand operations that may increase its air emissions. Determining whether a proposed project triggers the threshold to obtain an NSR permit is a two-step process. At Step 1, a determination must be made whether the proposed project will, by itself, result in a significant emissions increase. If a significant emissions increase is projected to occur, the process moves on to Step 2, where a determination must be made whether there will be an overall increase in emissions, when all of the other emissions increases and emissions decreases that may have occurred at the facility over the preceding several years, and which are unrelated to the proposed project, are accounted for. This Step 2 "contemporaneous netting" calculation can be complicated and time-consuming to undertake.

This proposal clarifies that both projected emissions increases *and* projected decreases that are attributable to a proposed project can be considered during Step 1 of the two-step NSR applicability test. This process, once called "project netting," is now more accurately known as project emissions accounting.

EPA expects that allowing emissions accounting at Step 1 will reduce regulatory burden -- saving time and money without sacrificing environmental protection. If the results of this Step 1 evaluation show that the proposed project will not result in a significant emissions increase (*e.g.*, because any emissions increases attributable to the project are offset by emissions decreases occurring elsewhere at the source due to the project), this would end the applicability evaluation. In general, the project could then proceed under a state-issued minor source permit. This saves resources that would otherwise be required for a complex multi-unit evaluation prior to a major NSR permit applicability determination.

EPA will accept public comment on this proposal for 60 days after it is published in the *Federal Register*.

For more information see: https://www.epa.gov/nsr/nsr-regulatory-actions

# # #

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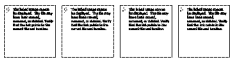

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Message

From: Garvey, Megan [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7623E34F292C43ECBB4B01555594B604-GARVEY, MEG]
Sent: 7/30/2019 9:43:12 PM
To: Garvey, Megan [garvey.megan@epa.gov]
BCC: Matthew Todd [toddm@theenvironmentalpartnership.org]; 'Kathleen Sgamma' [ksgamma@westernenergyalliance.org]; Greg Schrab [gschrab@sm-energy.com]; Jesse Sandlin [Jesse.Sandlin@nblenergy.com]; 'Maggi Young' [maggi.young@chk.com]; Rikki hrenko-browning [rhrenko-browning@utahpetroleum.org]; Siffring, Stuart [ssiffring@westernenergyalliance.org]; bthompson@axpc.us; Benevento, Douglas [benevento.douglas@epa.gov]; Cheatham-Strickland, Latonia [Cheatham-Strickland.Latonia@epa.gov]; Chapman, Apple [Chapman.Apple@epa.gov]; Mia, Marcia [Mia.Marcia@epa.gov]; Christy Woodward [christy.woodward@coga.org]; Pratt, Karen [Karen_Pratt@xtoenergy.com]; 'Djordan@newfield.com' [Djordan@newfield.com]; Bowles, Jack [Bowles.Jack@epa.gov]
Subject: Revised Implementation Considerations for EPA's O&G New Owner Program

Good afternoon:

On July 25, 2019 the EPA posted to its website revised Implementation Considerations for the "Oil and Natural Gas Exploration and Production Facilities New Owner Audit Program Agreement." The revised Implementation Considerations clarify that any interested person may propose that equivalent engineering, design, and/or operational measures be used in lieu of those specified in Appendix B. The required demonstration remains unchanged. EPA will accept equivalency proposals from interested parties for up to one year following the Agreement's effective date.

The revised language is on page 6 of the *Oil and Gas New Owner Program Questions and Answers* document found here.

The main webpage for the New Owner Audit Program can be found here.

If you have any questions about the Program or the recent revisions described above, please contact Apple Chapman, Deputy Director, Air Environment Division, Office of Civil Enforcement, U.S. EPA at (202) 564-5666.

Thanks, Megan

Megan E. Garvey
Senior Advisor for Oil and Gas, Regional Management and State Affairs
Office of the Administrator
U.S. Environmental Protection Agency
Work: 303.312.6192 | Cell: Ex. 6 Personal Privacy (PP)

Message

From: Garvey, Megan [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7623E34F292C43ECBB4B01555594B604-GARVEY, MEG]
Sent: 7/11/2019 6:16:13 PM
To: Greg Schrab [gschrab@sm-energy.com]
CC: Siffring, Stuart [ssiffring@westernenergyalliance.org]
Subject: RE: New Owner Self Audit Policy

Hi, Greg,

Great to see you, again, too.

Now that you highlighted the language I circulated, I can see how it looks limited to operators in the Audit Program. I spoke with Patrick Traylor this morning about this very matter and we chatted about how the opportunity to provide feedback was open to all. Let me look for additional language and talk to Patrick about how we can clarify this. I will get back to you soon.

Thanks, Megan

Megan E. Garvey
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From: Greg Schrab <gschrab@sm-energy.com>
Sent: Thursday, July 11, 2019 11:20 AM
To: Garvey, Megan <garvey.megan@epa.gov>
Cc: Siffring, Stuart <ssiffring@westernenergyalliance.org>
Subject: RE: New Owner Self Audit Policy

Hey Megan,

It was great to see you again the other day, thanks for meeting with our small AXPC group! Anyway, I wanted to follow up again on the possibility you raised on providing feedback on the new owner audit policy, also with Stuart and I after the WEA regulatory committee meeting you attended a couple months ago. I'm reading below again what you sent to Stuart and I back in May, and it appears it's only participating new owners that can provide feedback on equivalent approaches in the self-audit. Or is there some language somewhere else that asks for general input by industry?

Thanks,

Greg

Greg Schrab, CHMM, CSP
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From: Greg Schrab
Sent: Thursday, May 9, 2019 12:29 PM
To: Garvey, Megan <garvey.megan@epa.gov>
Cc: Siffring, Stuart <ssiffring@westernenergyalliance.org>
Subject: RE:

Thanks Megan, and great to see you too!

Thanks,

Greg

Greg Schrab, CHMM, CSP
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From: Garvey, Megan <garvey.megan@epa.gov>
Sent: Thursday, May 9, 2019 12:23 PM
To: Greg Schrab <gschrab@sm-energy.com>
Cc: Siffring, Stuart <ssiffring@westernenergyalliance.org>
Subject: RE:

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Thanks, Greg.

Stuart and Greg:

The invitation for feedback on the New Owner Audit Program is on page 6 of the Implementation Considerations document (also referred to as the Oil and Gas New Owner Program Questions and Answers):

https://www.epa.gov/sites/production/files/2019-03/documents/ognewownerprogramquestionsandanswers032919.pdf

The EPA is Providing Participating New Owners with Additional Operational Flexibility for Completing Appendix B

For up to one year following the Agreement's effective date, a New Owner may propose equivalent engineering, design, and/or operational measures in lieu of those specified in Appendix B. The proposed measures shall demonstrate that:

1. vapor control system pressures will not exceed the applicable leak points during normal operations;

2. vapor control systems achieve stated control efficiencies during normal operations; and
3. compromised equipment is detected and repaired or replaced.

Thanks and nice to see you both! Megan

Megan E. Garvey
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Message

From: Garvey, Megan [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7623E34F292C43ECBB4B01555594B604-GARVEY, MEG]
Sent: 5/17/2019 4:10:11 PM
To: Garvey, Megan [garvey.megan@epa.gov]
BCC: Siffring, Stuart [ssiffring@westernenergyalliance.org]; ksgamma@westernenergyalliance.org; Christy Woodward [christy.woodward@coga.org]; Rikki Hrenko-Browning [rhrenko-browning@utahpetroleum.org]; Ron Ness [ronness@ndoil.org]; andrew.casper@coga.org; paulesm@api.org; lcurtsinger@cochamber.com
Subject: Draft Produced Water Study Released by EPA

Good morning:

The U.S. Environmental Protection Agency (EPA) is seeking public input on a draft study that takes a holistic look at how the agency, states, tribes, and others view the current state of regulation and management of wastewater from the oil and gas industry and provides insight into how this wastewater might be returned to beneficial use in the water cycle. The deadline to provide input is **July 1, 2019**.

In May 2018, EPA announced the initiation of a Study of Oil and Gas Extraction Wastewater Management. The agency conducted a robust outreach effort to gather input from state, tribal, industrial, academic, environmental, public health and other entities for the study. This included meeting with individual entities, accepting written input through a public docket on regulations.gov, and hosting a national public meeting in October 2018 to report on what EPA had learned to date and to provide stakeholders an additional opportunity to provide input.

Thank you, Megan

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