

Message

From: Lee Fuller [fuller@ipaa.org]
Sent: 4/2/2018 3:30:06 PM
To: Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clint]; Gunasekara, Mandy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=53d1a3caa8bb4ebab8a2d28ca59b6f45-Gunasekara,]; Schwab, Justin [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=eed0f609c0944cc2bbdb05df3a10aadb-Schwab, Jus]
CC: James D. Elliott (jelliott@spilmanlaw.com) [jelliott@spilmanlaw.com]
Subject: Subpart OOOOa
Attachments: Information for IPAA-EPA Meeting - Subpart OOOOa - March 13 2018.pdf

On March 13, IPAA, several state based trade associations and several member companies met with EPA staff at Research Triangle Park to discuss our concerns with the current structure of Subpart OOOOa. While the discussion addressed a number of issues, most of it focused on various definitions that create the scope of the application of the regulations, the fugitive emissions monitoring program and decisions related to the treatment of low production wells. We provided the attached document at the meeting; it is principally addressing the nature of the industry and the role of low production wells including material that responds to published statements by EPA regarding its decision to remove the proposed exclusion of low production wells from the fugitive emissions monitoring program. These include a response to the Environmental Defense Fund allegations that low production wells are “super emitters” and EPA’s use of component counts in justifying the inclusion of low production wells.

Clearly, there are other policy issues that we would like to address, too. I would like to suggest a meeting to bring these before you in the near future.

Thanks,

Lee Fuller