

Message

From: Matthew Todd [ToddM@api.org]
Sent: 9/24/2018 5:44:12 PM
To: Tsirigotis, Peter [Tsirigotis.Peter@epa.gov]
CC: Gunasekara, Mandy [Gunasekara.Mandy@epa.gov]; Cozzie, David [Cozzie.David@epa.gov]; Stoneman, Chris [Stoneman.Chris@epa.gov]; Nizich, Greg [Nizich.Greg@epa.gov]
Subject: API Letter re: EPA's Tribal Lands Federal Implementation Plan
Attachments: 2018 09 24 API Tribal Lands FIP Letter Final.pdf

Importance: High

Dear Mr. Peter Tsirigotis,

On August 2, 2015, the American Petroleum Institute filed a petition with the Administrator of the U.S. EPA seeking changes to the Federal Implementation Plan for True Minor Sources in Indian Country in the Oil and Natural Gas Production and Natural Gas Processing Segments of the Oil and Natural Gas Sector. 81 Fed. Reg. 35944 (June 3, 2016). Through subsequent discussions with the agency, we have concluded the FIP can be improved to provide greater clarity through minor modifications of the FIP and clarifying interpretations of key provisions. By this letter, we seek your consideration of the issues described and how EPA may incorporate these changes through additional guidance or FIP amendments.

Thank you for your attention and please feel free to contact me at 202-682-8319 with any questions regarding the content of the letter.

Sincerely,

Matt

Matthew Todd
API
202.682.8319