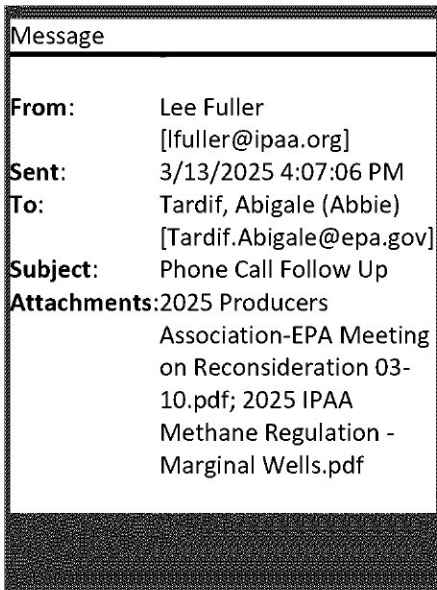




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Thank you again for reaching out on the reconsideration initiatives.

As I mentioned, IPAA is a Washington based, federally focused trade association representing upstream components of the oil and natural gas industry. Its membership spreads across this portion of the industry including independent producers from large publicly traded companies to small marginal well producers and the supporting industries like drilling and fracturing companies. Because of this scope and the presence of other trades representing large companies, IPAA tries to assure that the small producer interests are heard.

IPAA has been actively involved in the development of the Subpart OOOO group of regulations and with Subpart W and its application to the MERP Waste Emissions Charge. In many of these efforts, IPAA leads a group of producers (Producers Association). In this context, we filed litigation challenging the Subpart OOOOb regulations and Subpart OOOOc emissions guidelines and challenging revisions to Subpart W and the Waste Emissions Charge. We also submitted petitions for reconsideration on Subparts OOOOb and OOOOc and on Subpart W.

This week, we had a video conference with EPA staff on Subparts OOOOb and OOOOc. I am attaching the outline we used for that conversation. On February 14, we had a video conference with EPA staff on Subpart W. We did not provide an outline for that meeting but I can provide a summary of our issues if it would be helpful.

I am also attaching an outline on marginal well impacts that IPAA used for a document sent to the Trump Transition team.

Because we are engaged on the implications of regulation under Subpart OOOOc on existing sources, we have been particularly concerned about the structure of the planning process under Section 111(d). Section 111(d) was never written for a pool of existing sources that approaches one million and are as diverse as oil and natural gas production. Consequently, the deadlines for state plans and the structure of the Remaining Useful Life and Other Factors (RULOF) provisions can have critical impacts on small producers. Estimates of the impact on these

operations if the Subpart OOOOc Emissions Guidelines are implemented as written suggest that 300,000 of these wells will have to shut down.

Certainly, we would like to discuss these issues more thoroughly. Please let me know if I can provide more information.

Lee Fuller