

**To:** Dravis, Samantha[dravis.samantha@epa.gov]  
**From:** Brandon Kirkham  
**Sent:** Tue 4/4/2017 4:38:52 PM  
**Subject:** OOOO(a) LDAR Monitoring Requirements

Samantha:

An item that was discussed in our initial meeting was looming compliance deadlines associated with LDAR monitoring requirements in OOOO(a):

Marathon Oil's business in Oklahoma has been waiting to incur an initial \$30,000 cost to conduct the initial monitoring surveys by the June 3<sup>rd</sup> regulatory deadline. All operators are approaching a timeframe in which they are already or will have to proceed with that initial monitoring even though we anticipate ultimate compliance with this rule will not be necessary due to the EO.

The above example is just one operator in one basin and I can follow-up with more information regarding Eagle Ford, Permian and Bakken if it is helpful.

The requirement:

40 CFR 5397a(f)(1) You must conduct an initial monitoring survey within 60 days of the startup of production, as defined in §60.5430a, for each collection of fugitive emissions components at a new well site or by June 3, 2017, whichever is later. For a modified collection of fugitive emissions components at a well site, the initial monitoring survey must be conducted within 60 days of the first day of production for each collection of fugitive emission components after the modification or by June 3, 2017, whichever is later.

Appreciate any guidance you could provide,

Brandon

Brandon Kirkham

Four Rivers Consulting

brandon@frc-dc.com

202-329-4160