



July 2, 2018

Via Federal eRulemaking Portal: <http://www.regulations.gov>

Mr. Scott Pruitt
Administrator
U.S. Environmental Protection Agency
EPA Docket Center
Mail Code 2821T
1200 Pennsylvania Ave., NW
Washington, D.C. 20460

Re: *Amendments to Federal Implementation Plan for Managing Air Emissions from True Minor Sources Engaged in Oil and Natural Gas Production and Natural Gas Processing Segments of the Oil and Natural Gas Sector* – Docket ID number: EPA-HQ-OAR-2014-0606

Dear Administrator Pruitt:

Western Energy Alliance submits the following comments on the U.S. EPA *Amendments to Federal Implementation Plan for Managing Air Emissions from True Minor Sources Engaged in Oil and Natural Gas Production and Natural Gas Processing Segments of the Oil and Natural Gas Sector* (referred to herein as the FIP Amendments).

The Alliance represents over 450 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 fifteen employees.

GPA Midstream Association (GPA Midstream) supports Western Energy Alliance's comments regarding the FIP Amendments. GPA Midstream has served the U.S. energy industry since 1921. GPA Midstream is composed of nearly 100 corporate members of all sizes that are engaged in the gathering and processing of natural gas into merchantable pipeline gas, commonly referred to in the industry as "midstream activities." As such, GPA Midstream has member companies that are impacted by this action.

Many of our members operate in Indian country and have come to rely on the streamlined permitting approach that is available through the National Oil and Natural Gas Federal Implementation Plan (referred to herein as the National FIP). The recent nonattainment designation of the Uinta Basin puts this permitting option in jeopardy, and prevents the future responsible development of mineral resources on Indian Lands.

Western Energy Alliance supports the three changes proposed in the FIP Amendments. First, we support EPA's decision to amend the National FIP to extend its applicability to eligible true minor sources in the Uinta Basin Nonattainment Area. We agree with EPA's

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assessment of the impending issue that the nonattainment designation would “immediately cause a disparity in the regulatory landscape facing such activity in the affected area, as compared to all other areas of Indian country that will remain covered by the FIP.” 83 Federal Register 20778 (May 8, 2018). Second, we support EPA’s proposed strategy to make the FIP Amendments permanent. As EPA stated in the proposal, there is an obvious concern that any temporary extension of the FIP Amendments would have a significant effect on oil and natural gas activity on the U&O Reservation. The permitting delays associated with sources losing coverage under the National FIP would have a serious effect on the revenue which the Ute Indian Tribe relies upon for its livelihood. See 83 Federal Register 20781. Third, we look forward to working with EPA to assist in developing the U&O reservation specific FIP. We have a unique opportunity to work together toward our common goals of continued uninterrupted development of the oil and natural gas resources, clean air, and regulatory certainty in the Uinta basin.

In conclusion, the Alliance reiterates the continued need for a truly streamlined permitting mechanism that conserves the agency’s resources and facilitates development in Indian country. We thank EPA for the opportunity to comment on the proposed FIP Amendments and would like to continue to work with EPA as it further develops this program. Please feel free to contact me regarding any questions with our comments.

Sincerely,



Kathleen M. Sgamma
Vice President of Government and Public Affairs