



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
RESEARCH TRIANGLE PARK, NC 27711

OFFICE OF  
AIR QUALITY PLANNING  
AND STANDARDS

April 30, 2015

Dear Tribal Leader:

In January 2015, the U.S. Environmental Protection Agency (EPA) announced a series of steps it plans to take to address methane and smog-forming volatile organic compound (VOC) emissions from the oil and gas industry, in order to ensure continued, safe and responsible growth in U.S. oil and natural gas production. The EPA's plans to address methane are part of the overall Strategy to Reduce Methane Emissions – a component of the president's Climate Action Plan. The strategy, announced in January, consists of both regulatory and voluntary approaches. In February, the EPA asked tribes to nominate themselves to participate in discussions about their efforts to address sources of emissions in the oil and gas sector. Tribal input was received in a telephone conference call in April.

The EPA's plans to address the Methane Strategy includes four actions that we plan to propose this summer.

First, the EPA plans to build on our 2012 New Source Performance Standards (NSPS) for the oil and gas industry to reduce methane emissions and to achieve additional reductions in VOCs. We are focusing on the following sources:

- Completions of hydraulically fractured oil wells,
- Liquids unloading,
- Pneumatic pumps,
- Fugitive emissions from new and modified well sites and compressor stations, and
- Pneumatic controllers and compressors in the transmission and storage segment.

Second, the EPA issued a rule in July 2011 that requires small sources in Indian country to obtain minor source permits by a fixed deadline. Last year, we extended the minor New Source review (NSR) permitting deadline to March 2, 2016, for "true minor" oil and natural gas sources in Indian country. Also last year, we issued an Advance Notice of Proposed Rulemaking (ANPR) seeking feedback on options for streamlining the "Minor NSR Program in Indian Country" for true minor sources in the oil and natural gas sector. We have been reviewing comments on the ANPR, and we plan to propose a national option for streamlining the "Minor NSR Program in Indian Country." The proposal will include proposed requirements for new and modified sources in Indian country that are consistent with those in the 2012 NSPS and the updated NSPS, as well as in other EPA emission standards.

Third, in a separate rulemaking, the EPA will proposed an updated definition of "source" for oil and gas extractions operations for purposes of determining whether the operations are subject to major or minor source permitting requirements. This will help provide certainty to regulators and the regulated community.

Finally, we will be making available for comment draft control techniques guidelines (CTGs) for requiring reasonably available control technology (RACT) to achieve VOC reductions from existing sources in ozone nonattainment areas that are classified as Moderate and above, and in states in the Ozone Transport Region. Once a final CTG is issued, states with nonattainment areas and states in the Ozone Transport Region that are required to implement RACT would have to update their State Implementation Plans showing how they will reduce VOC emissions from sources covered by the CTG. These guidelines could also become the basis for requirements for oil and gas activity in a tribal ozone nonattainment area.

Our plan is to issue these four proposed actions for public comment in the summer of this year and to finalize them in 2016. The purpose of this letter is to invite you to have informal discussions or consult prior to issuance, should you believe your tribe could be affected by these actions. If you prefer to initiate government- to- government consultation with the EPA, please contact Toni Colón at (919) 541-0069, email: [colon.toni@epa.gov](mailto:colon.toni@epa.gov). Please contact us by May 25, 2015 in order to request consultation.

We request your input to assure that we develop the best rules and guidelines possible. We endeavor to conduct our efforts with sensitivity to the needs and culture of your tribe and with attention to the potential impact of our actions. We look forward to hearing from you.

Sincerely,

/s/

Gregory A. Green, Director  
Outreach and Information Division

cc: Tribal Environmental Director  
Tribal Environmental Staff