



REGION 10
SEATTLE, WA 98101

July 1, 2024

Mr. David Pascal
Chief Operating Officer
Savant Alaska, LLC
601 West 5th Avenue, Suite 310
Anchorage, Alaska 99501

Re: NSPS OOOOa Alternative Reporting Timeline

Dear Mr. Pascal:

This is a response to your letter written on behalf of Savant Alaska, LLC (Savant) dated June 12, 2024, in which you request an alternative reporting timeline for the annual reporting required by 40 CFR 60.5420a(b) for activities subject to 40 CFR part 60, subpart OOOOa: *Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification, or Reconstruction Commenced after September 18, 2015* (NSPS OOOOa). We are granting your request as described below.

Background

Savant owns and operates the Badami Development Facility located on the North Slope of Alaska. The Badami Development Facility is an existing oil and gas exploration and production operation. Operations include activities and equipment potentially subject to NSPS OOOOa, which requires annual reports containing the information in 40 CFR 60.5420a(b)(1)-(8). Savant's current reporting period runs from May 17 through the following May 16 with reports due by August 14.

In your letter, you report that Savant would like to shift the NSPS OOOOa annual reporting period to better align with the fugitive emissions components monitoring schedule. The NSPS OOOOa surveys are typically conducted in May, once weather conditions on Alaska's North Slope become favorable for performing the surveys. With the current reporting period, Savant states that there has been some confusion with both the surveys and the end of the reporting period both occurring in May. In order to alleviate that confusion, Savant wishes to shift the NSPS OOOOa annual reporting period to April 1, through the following March 31, with reports due by June 29. This will require shortening the current reporting period to avoid extending a reporting period.

Savant has proposed the following alternative reporting periods and schedule for exploration activities:

- Shortened reporting period for 2023-2024:
 - Reporting period: May 17, 2023, through March 31, 2024;
 - Report Due: June 29, 2024;
- Future reporting periods (example, 2024-2025):
 - Reporting period: April 1, 2024, through March 31, 2025;
 - Report Due: June 29, 2025.

Other than a change in reporting period, Savant is not requesting any additional changes to the required reporting.

Regulatory Basis

According to 40 CFR 60.5420a(b), which requires the annual reports: *"You may arrange with the Administrator a common schedule on which reports required by this part may be submitted as long as the schedule does not extend the reporting period."*

Furthermore, according to 40 CFR 60.19, General Notification and Reporting Requirements, reporting *"... time periods or deadlines may be changed by mutual agreement between the owner or operator and the Administrator."* See 40 CFR 60.19(c) and (f).

Because the state of Alaska has not requested delegation of NSPS OOOOa, the EPA remains the Administrator responsible for implementing the subpart.


Determination

We agree that the alternative reporting schedule is warranted. There is never an extension of an annual reporting period beyond 12 consecutive months. Therefore, the EPA approves your request for an alternative reporting period for the Badami Development Facility, as proposed in your request and described in this letter.

If you have any questions about this matter, please contact Ms. Valerie Gardner of my staff at (907) 271-6561 or gardner.valerie@epa.gov.

Sincerely,

DAVID BRAY

 Digitally signed by DAVID BRAY
Date: 2024.07.01 15:45:44 -07'00'

David Bray, Branch Manager
Air Permits, Toxics, Transportation,
and Communities Branch
Air and Radiation Division

cc: Mr. Jim Plosay
Alaska Department of Environmental Conservation

Mr. Moses Coss
Alaska Department of Environmental Conservation

Ms. Lynnette Peluso
Savant Alaska LLC

Ms. Kaley Volper
SLR International Corporation