

## Alaska Oil and Gas Association

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*Kate Williams, Regulatory Affairs Representative*

March 11, 2011

Mr. Larry Hartig  
Commissioner  
Alaska State Department of Environmental Conservation  
410 Willoughby Ave., Ste. 103  
P.O. Box 111800  
Juneau, AK 99811-1800

**Re: Postpone transition of NPDES primacy for the oil and gas sector from EPA to ADEC**

Dear Commissioner Hartig:

This letter follows our phone conversation on Tuesday, March 8, 2011 regarding the U.S. Environmental Protection Agency (“EPA”)/Alaska Department of Environmental Conservation (“ADEC”) proposal to postpone transition of primacy for the National Pollutant Discharge Elimination System (“NPDES”) program for the oil and gas sector until June 30, 2013.

The Alaska Oil and Gas Association (“AOGA”) supports a postponement of one-year, until October 31, 2012, from the date the transfer of authority was originally scheduled to occur, October 31, 2011, in an effort to help EPA and ADEC address permit backlog and staff capacity issues. We understand that ADEC will work with EPA on a schedule to complete and issue the following permits prior to the program being transferred to ADEC on October 31, 2012, as well as regular updates to stakeholders on the agencies’ progress:

- North Slope General Permit (AKG330000)
- Alyeska Pipeline Marine Terminal (AK0023248)
- Beaufort Exploration General Permit (AKG282100)
- Chukchi Exploration General Permit (AKG288100)

AOGA also understands that ADEC and EPA will use good faith efforts to commit the necessary resources, including adequate staffing levels, to issue these permits by October 31, 2012, and ensure ADEC is prepared to administer the NPDES program for the oil and gas sector after that date.

Commissioner Hartig  
ADEC  
March 11, 2011

Page 2

The importance of these permits to not only the continued operation of existing oil and gas projects in Alaska, but new projects waiting to come online, cannot be overstated. AOGA looks forward to working with ADEC and EPA in the coming months to complete and issue the above-listed permits and toward a successful transition of authority from the EPA to ADEC on October 31, 2012. Thank you for providing us an opportunity to provide input on the timing of this transition, and we look forward to continuing to work with you on this critical issue.

Sincerely,

A handwritten signature in black ink that reads "Kate Williams". The signature is written in a cursive, flowing style.

KATE WILLIAMS  
Regulatory Affairs Representative

Cc: Dan Easton, Deputy Commissioner, Alaska Department of Environmental Conservation  
Lynn Kent, Director, Division of Water, Alaska Department of Environmental Conservation