

Alaska Oil and Gas Association



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Kara Moriarty, President/CEO

February 1, 2022

<https://water.alaskadec.commentinput.com/?id=rtFfj>

Tonya Bear
ADEC Division of Water
610 University Avenue
Fairbanks, AK 99709

Re: Notice of Proposed Changes in Wastewater Treatment and Disposal Regulations

Dear Ms. Bear:

The Alaska Oil and Gas Association (“AOGA”) is a professional trade association whose mission is to foster the long-term viability of the oil and gas industry for the benefit of all Alaskans. We represent the majority of companies that are exploring for, developing, producing, refining, transporting, or marketing oil and gas on the North Slope, in the Cook Inlet, and in the offshore areas of Alaska. This letter is to request a 60-day extension of the February 18, 2022 deadline for submittal of comments on the proposed revisions to 18 AAC 72 Wastewater Treatment and Disposal Regulations.

ADEC proposes to significantly revise these regulations, including a major reorganization throughout and an expansion in permit-by-rule processes. AOGA seeks to provide to the ADEC focused and robust comments to help meet the ADEC’s stated goal of providing better clarity of regulatory requirements by system type. To do so, AOGA intends to bring to bear our members’ vast engineering expertise. A comment deadline of February 18, 2022 simply does not provide enough time to marshal the resources necessary to fully develop meaningful comments that will inform the ADEC’s judgment.

For these reasons, AOGA requests that the ADEC extend the comment deadline by at least 60 days. We appreciate the ADEC’s consideration of AOGA’s concerns and look forward to your response.

Sincerely,

A handwritten signature in black ink that reads "Kara Moriarty".

KARA MORIARTY
President/CEO