**From:** Palkovic, Patricia L (DNR)
**Sent:** Tuesday, August 26, 2008 10:29 AM
**To:** Freeman, Martha Welbourn (DNR)
**Subject:** follow up thought on renewals

Just FYI.

Couple months ago on call with Mike about the AMHT Petersburg notification we talked about renewals and whether operations need to be renewed each year or if can they skip years.

Did not think about it until after the call, but another reason why we are not requiring a unit/road to be renewed each year is because under 11 AAC 95.220(d): the DPO “will be accepted only for those portions of the operation that the operator states will be completed by December 31 of the year for which the plan is submitted…” – so if we require renewals each year, even for a unit that the operator is not planning to operate in, we would be causing the operator to violate this regulation.  Combine this with the thought that if there has been no changes to either the operating plan or the regulations since the original notification, what reason would there be to warrant a 30-day review (and associated time/money cost to state agencies) for something that has already been reviewed?  I concur with your comment that there is no clear guidance.

Pat