

**STATE OF ALASKA**  
**ALASKA OIL AND GAS CONSERVATION COMMISSION**  
**333 West 7th Avenue, Suite 100**  
**Anchorage Alaska 99501**

Re: THE APPLICATION OF BP	)	Docket Number: AIO-13-12
EXPLORATION (ALASKA) INC. for	)	Area Injection Order No. 25A.016
Administrative Approval to inject	)	
radioactive tracers used for surface facility	)	Prudhoe Bay Unit
optimization in enhanced oil recovery	)	Polaris Oil Pool
injection wells.	)	North Slope, Alaska
	)	
	)	June 20, 2013

By letter dated May 14, 2013, BP Exploration (Alaska) Inc. (BPXA) requested administrative approval to introduce radioactive tracers into the Gathering Center 2 (GC2) production facility for the purpose of facility optimization. After passing through the production facility the radioactive tracers would be entrained in the produced water injection system and injected in enhanced oil recovery and disposal wells.

Radioactive tracers are not regulated by the Resource Conservation and Recovery Act (RCRA). The volume of radioactive tracer material will be exceedingly small in proportion to the millions of gallons of produced water that GC2 handles on a daily basis. The half-life of the proposed tracers is less than two days.

The exceedingly small volume and low concentration of the radioactive tracer material in the produced water stream will have no impact on its performance as an enhanced oil recovery injectant, and will not result in any formation or reservoir fluid compatibility issues. Therefore, amending the list of approved fluids to include radioactive tracer fluids introduced to production facilities is appropriate.

**NOW THEREFORE IT IS ORDERED THAT:**

**Rule 3 of AIO 25A is repealed and replaced by the following:**

**Rule 3. Authorized Fluids for Enhanced Recovery**

The fluids authorized by this Order for injection are as follows:

- a) Produced water and gas from Prudhoe Bay Unit processing facilities;
- b) Enriched hydrocarbon gas;
- c) Non-hazardous water and water based fluids – (specifically seawater, source water, freshwater, domestic wastewater, equipment washwater, sump fluids, hydrotest fluids, firewater, and water with trace chemicals, and other water based

fluids with a pH greater than 2 and less than 12.5 and flashpoint greater than 140 degrees F);

- d) Fluids introduced to production facilities for the purpose of oil production, plant operations, plant/piping integrity or well maintenance that become entrained in the produced water stream after oil, gas, and water separation in the facility.

Specifically:

- i. Freeze protection fluids;
- ii. Fluids in mixtures of oil sent for hydrocarbon recycle;
- iii. Corrosion/scale inhibitor fluids;
- iv. Anti-foams/emulsion breakers;
- v. Glycols;
- vi. Radioactive tracer survey fluids

- e) Non-hazardous glycols and glycol mixtures;

- f) Fluids that are used for their intended purpose within the oil production process.

Specifically:

- i. Scavengers;
- ii. Biocides

- g) Fluids to monitor or enhance reservoir performance. Specifically:

- i. Tracer survey fluids;
- ii. Well stimulation fluids;
- iii. Reservoir profile modification fluids.

**DONE** at Anchorage, Alaska and dated June 20, 2013.



Daniel T. Seamount, Jr.  
Commissioner



John K. Norman  
Commissioner

#### RECONSIDERATION AND APPEAL NOTICE

As provided in AS 31.05.080(a), within 20 days after written notice of the entry of this order or decision, or such further time as the AOGCC grants for good cause shown, a person affected by it may file with the AOGCC an application for reconsideration of the matter determined by it. If the notice was mailed, then the period of time shall be 23 days. An application for reconsideration must set out the respect in which the order or decision is believed to be erroneous.

The AOGCC shall grant or refuse the application for reconsideration in whole or in part within 10 days after it is filed. Failure to act on it within 10-days is a denial of reconsideration. If the AOGCC denies reconsideration, upon denial, this order or decision and the denial of reconsideration are FINAL and may be appealed to superior court. The appeal MUST be filed within 33 days after the date on which the AOGCC mails, OR 30 days if the AOGCC otherwise distributes, the order or decision denying reconsideration, UNLESS the denial is by inaction, in which case the appeal MUST be filed within 40 days after the date on which the application for reconsideration was filed.

If the AOGCC grants an application for reconsideration, this order or decision does not become final. Rather, the order or decision on reconsideration will be the FINAL order or decision of the AOGCC, and it may be appealed to superior court. That appeal MUST be filed within 33 days after the date on which the AOGCC mails, OR 30 days if the AOGCC otherwise distributes, the order or decision on reconsideration. As provided in AS 31.05.080(b), "[t]he questions reviewed on appeal are limited to the questions presented to the AOGCC by the application for reconsideration."

In computing a period of time above, the date of the event or default after which the designated period begins to run is not included in the period; the last day of the period is included, unless it falls on a weekend or state holiday, in which event the period runs until 5:00 p.m. on the next day that does not fall on a weekend or state holiday.