

# STATE OF ALASKA

SARAH PALIN, GOVERNOR

## **ALASKA OIL AND GAS CONSERVATION COMMISSION**

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ANCHORAGE, ALASKA 99501-3539  
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### **ADMINISTRATIVE APPROVAL AREA INJECTION ORDER 2B.022**

Ms. MJ Loveland  
Problem Well Supervisor  
ConocoPhillips Alaska, Inc.  
P.O. Box 100360  
Anchorage, AK 99510-0360

RE: KRU 3A-11 (PTD 1852380) Request for Administrative Approval

Dear Ms. Loveland:

In accordance with Rule 9 of Area Injection Order ("AIO") 02B.000, the Alaska Oil and Gas Conservation Commission ("AOGCC" or "Commission") hereby grants ConocoPhillips Alaska Inc. ("CPAI")'s request for administrative approval to continue water injection in the subject well. This administrative approval replaces the previous waiver approved by sundry (301-344). CPAI must submit a Report of Sundry Well Operations, Form 10-404 to cancel sundry 301-344.

Kuparuk River Unit ("KRU") 3A-11 exhibits tubing by inner annulus communication. The Commission finds that CPAI does not intend to perform repairs at this time, deferring until location of the communication can be determined. The Commission further finds, based upon reported results of CPAI's diagnostic procedures and wellhead pressure trend plots, that KRU 3A-11 exhibits at least two competent barriers to the release of well pressure.

The recent pressure history provided by CPAI shows that the inner annulus pressure equalizes with the 2,600 psi injection pressure, which is approximately 50 percent of the production casing's minimum internal yield pressure rating. Should the well develop communication to the outer annulus, the current injection pressure would represent 70 percent of the surface casing's minimum internal yield pressure rating.

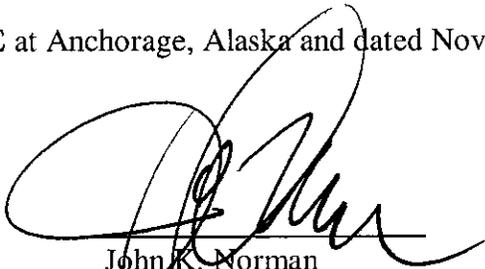
Outer annulus pressures must be monitored and engineering controls must be installed to assure ongoing integrity of the surface casing. With such in place, the Commission believes that the well's condition would not compromise overall well integrity so as to threaten human safety or the environment.

AOGCC's administrative approval to continue water injection only in KRU 3A-11 is conditioned upon the following:

1. CPAI shall record wellhead pressures and injection rate daily;
2. CPAI shall submit to the AOGCC a monthly report of well pressures, injection rates, and pressure bleeds for all annuli;
3. CPAI shall perform an MIT-IA every 2 years to the maximum anticipated injection pressure;
4. Within 30 days of the effective date of this approval, CPAI shall install, maintain and operate automatic well shut-in equipment on the well's outer annulus. The actuation pressure shall not exceed 1,000 psi. Testing of the shut-in equipment shall be performed in conjunction with production well pilots and safety valves;
5. CPAI shall immediately shut in the well and notify the AOGCC if there is any change in the well's mechanical condition;
6. After well shut in due to a change in the well's mechanical condition, AOGCC approval shall be required to restart injection; and
7. The MIT anniversary date is August 20, 2007.

As provided in AS 31.05.080(a), within 20 days after written notice of this decision, or such further time as the Commission grants for good cause shown, a person affected by it may file with the Commission an application for reconsideration. A request for reconsideration is considered timely if it is received by 4:30 PM on the 23rd day following the date of this letter, or the next working day if the 23rd day falls on a holiday or weekend. A person may not appeal a Commission decision to Superior Court unless reconsideration has been requested.

**DONE** at Anchorage, Alaska and dated November 19, 2007.

  
John K. Norman  
Chairman

  
Cathy P. Foerster  
Commissioner

