

# 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 AIO 2B.042

Mr. Brent Rogers  
Problem Wells Supervisor  
ConocoPhillips Alaska, Inc.  
P.O. Box 100360  
Anchorage, AK 99510-0360

RE: KRU 3Q-15 (PTD 1861780) Request for Administrative Approval  
Kuparuk River Oil Pool

Dear Mr. Rogers:

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-alternating-gas injection with shortened gas injection cycles in the subject well.

Kuparuk River Unit (KRU) 3Q-15 exhibits inner annulus re-pressurization which has been attributed to the wellhead seals and thread seals drying out after the well has injected gas for several months. The Commission approved a trial involving a shortened gas injection cycle on January 8, 2008. The trial commenced in March 2009 following CPAI's completion of successful diagnostic testing in KRU 3Q-15. No sign of tubing by inner annulus communication was evident during the shortened gas injection cycle (8-week trial) based on information provided by CPAI.

Reported results of CPAI's diagnostic procedures and wellhead pressure trend plots indicate that KRU 3Q-15 exhibits at least two competent barriers to the release of well pressure. The Commission finds that CPAI does not intend to perform repairs at this time based on the well's passing all positive and negative pressure tests, and the encouraging results of the shortened gas injection cycle trial.

AOGCC's administrative approval to continue water-alternating-gas injection in KRU 3Q-15 is conditioned upon the following:

1. Each gas injection cycle shall not exceed 12 weeks;
2. CPAI shall record wellhead pressures and injection rate daily;

3. CPAI shall submit to the AOGCC a monthly report of well pressures, injection rates, and pressure bleeds for all annuli;
4. Maximum allowable inner annulus pressure is 2000 psi; maximum allowable outer annulus pressure is 1000 psi;
5. CPAI shall immediately swap the well to water injection if tubing by inner annulus communication is evident during a gas injection cycle, and AOGCC approval shall be required to restart gas injection;
6. CPAI shall immediately notify the AOGCC if there is any change in the well's mechanical condition;
7. CPAI shall perform an MIT-IA every 2 years to the maximum anticipated injection pressure; the MIT anniversary date is September 25, 2008.

**DONE** at Anchorage, Alaska and dated May 28, 2009.

  
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Daniel T. Seamount, Jr.  
Chairman

  
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Cathy P. Foerster  
Commissioner

  
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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 Commission grants for good cause shown, a person affected by it may file with the Commission 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 Commission 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 Commission 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 Commission mails, **OR 30** days if the Commission 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 Commission 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 Commission, and it may be appealed to superior court. That appeal **MUST** be filed within 33 days after the date on which the Commission mails, **OR 30** days if the Commission 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 Commission 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.