



THE STATE  
of **ALASKA**  
GOVERNOR BILL WALKER

## Alaska Oil and Gas Conservation Commission

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### ADMINISTRATIVE APPROVAL AREA INJECTION ORDER NO. 4F.004

Mr. Clint J. Spence  
Well Intervention ETL  
BP Exploration (Alaska), Inc.  
P.O. Box 196612  
Anchorage, AK 99519-6612

Re: Docket Number: AIO-15-030  
Request for administrative approval to allow well 13-06A (PTD 1972180) to be online in water only injection service with a shallow packer depth.  
Prudhoe Bay Unit (PBU) 13-06A (PTD 1972180)  
Prudhoe Bay Field  
Prudhoe Oil Pool

Dear Mr. Spence:

By letter dated July 1, 2015, BP Exploration (Alaska), Inc. (BPXA) requested administrative approval to continue water only injection in the subject well.

In accordance with Rule 9 of Area Injection Order (AIO) 04F.000, the Alaska Oil and Gas Conservation Commission (AOGCC) hereby **GRANTS** BPXA's request for administrative approval to continue water only injection in the subject well.

BPXA determined that 13-06 has a production casing leak at 238 ft which will be repaired per Sundry 315-264. The repair is a cement squeeze of the inner annulus with the top of cement estimated to be 1600 ft. BPXA plans to then cement the outer annulus entirely to surface. However, since the inner annulus will be cemented leaving only approximately 1600 ft of inner annulus available for monitoring, this annulus does not meet the requirement that an injection well be equipped with a packer set not more than 200' measured depth above the top of the perforations.

If injection does not occur into, through, or above freshwater, 20 AAC 25.450 authorizes less stringent well construction and integrity requirements if AOGCC determines the reduction in requirements will not result in an increased risk of movement of fluids into freshwater.

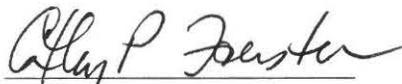
Pending the successful sundry 315-264 operations, BPXA will test the tubing and the 1600 ft of inner annulus prior to placing the well back into water only service. Upon passing the mechanical integrity tests, AOGCC can find that 13-06A exhibits at least two competent barriers

to the release of well pressure and determine that the well's condition does not compromise overall well integrity so as to threaten human safety or the environment.

AOGCC's approval to continue water injection only in PBU 13-06A is conditioned upon the following:

1. BPXA shall run an initial cement evaluation log as per Sundry 315-264 to confirm inner annulus isolation across the cemented interval and to determine the top of cement.
2. BPXA shall record wellhead pressures and injection rate daily;
2. BPXA shall submit to the AOGCC a monthly report of well pressures, injection rates, and pressure bleeds for all annuli. Bleeds to be flagged on the report;
3. BPXA shall perform a mechanical integrity test of the inner annulus every 2 years to the maximum anticipated injection pressure;
4. BPXA shall perform a mechanical integrity test of the tubing every 2 years to the maximum anticipated injection pressure;
5. BPXA shall limit the inner annulus pressure to below 2000 psi.
6. BPXA shall immediately shut in the well and notify the AOGCC if there is any change in the well's mechanical condition;
7. After well shut in due to a change in the well's mechanical condition, AOGCC approval shall be required to restart injection; and
8. The MIT anniversary date will be set as the date of the AOGCC witnessed MITIA that is to be completed once the well is returned to injection and stabilization is achieved. AOGCC must be provided the opportunity to witness the MIT for the test that will establish the new MIT anniversary date.

**DONE at Anchorage, Alaska and dated July 9, 2015.**



Cathy P. Foerster  
Chair, Commissioner



Daniel T. Seamount, Jr.  
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.

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.