

STATE OF ALASKA
ALASKA OIL AND GAS CONSERVATION COMMISSION
333 West Seventh Avenue
Anchorage, Alaska 99501

Re: The application of BP Exploration) Docket Number: OTH-16-002
(Alaska) Inc. for Administrative Waiver,) Other Order 110
Filing of Mechanical Logs Under 20)
AAC 25.071) May 23, 2016

IT APPEARING THAT:

1. By letter dated January 11, 2016, BP Exploration (Alaska) Inc. (BPXA) requests the Alaska Oil and Gas Conservation Commission (AOGCC) issue a waiver from the requirements of 20 AAC 25.071 for the filing of mechanical well logs in any format.
2. Pursuant to 20 AAAC 25.540, the AOGCC tentatively scheduled a public hearing for March 22, 2016. On February 17, 2016, the AOGCC published notice of the opportunity for that hearing on the State of Alaska's Online Public Notice website and on the AOGCC's website, electronically transmitted the notice to all persons on the AOGCC's email distribution list, and mailed printed copies of the notice to all persons on the AOGCC's mailing distribution list. On February 17, 2016, the AOGCC published the notice in the ANCHORAGE DISPATCH NEWS.
3. The hearing commenced at 9:00AM on March 22, 2016, in the AOGCC's offices located at 333 West 7th Avenue, Anchorage, Alaska.
4. Testimony was received from representatives of BPXA.
5. The record was closed at the end of the hearing.

FINDINGS:

1. Representatives of BPXA testified that specific types of Mechanical Logs do not analyze geologic formations in any way and do not provide any additional geologic knowledge. BPXA considers Mechanical Logs to be:
 - Perforating Records
 - Jewelry Logs
 - Inflatable Bridge Plugs
 - Tubing Patch Setting Records
 - Chemical Tubing Cut Records
 - Tubing Puncher Records
 - Jet Cutter Records
 - Pack of Gas Lift Mandrel Records
 - Leak Detection Logs
 - Caliper Surveys
2. BPXA requested the AOGCC recognize that these Mechanical Logs do not fall under the reporting requirements set out in 20 AAC 25.071.
3. BPXA believes that the initial request for Mechanical Logs under 20 AAC 25.071 and the resulting Administrative Waiver Request from BP are no longer valid.

CONCLUSIONS:

1. The AOGCC concurs that current regulation 20 AAC 25.071 does not regulate the types of logs that BP classifies as Mechanical Logs.
2. The Administrative Waiver Request from BP is not valid.
3. No changes to existing reporting requirements are required.

Done at Anchorage, Alaska and dated May 23, 2016.

//signature on file//
Cathy P. Foerster
Chair, Commissioner

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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.