

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

Re: THE APPLICATION OF Cook Inlet Natural Gas Storage Alaska, LLC for an order authorizing underground natural gas storage in the Cannery Loop Unit, Kenai Peninsula Borough, in conformance with 20 AAC 25.252 and 20 AAC 25.412. ) Docket SIO-10-05  
) Storage Injection Order No. 9  
)  
) Cannery Loop Field  
) Cannery Loop Unit  
) Sterling C Gas Storage Pool  
)  
) November 19, 2010

**IT APPEARING THAT:**

1. By application dated July 27, 2010, Cook Inlet Natural Gas Storage Alaska, LLC (CINGSA) requested a storage injection order from the Alaska Oil and Gas Conservation Commission (Commission or AOGCC) authorizing injection for underground storage of natural gas, in the proposed Sterling C Gas Storage Pool of the Cannery Loop Unit (CLU).
2. On August 20, 2010, pursuant to 20 AAC 25.540, the Commission published in the Alaska Journal of Commerce notice of opportunity for public hearing on October 19, 2010. Notice was also published in the Peninsula Clarion on August 29, 2010.
3. On September 13, 2010, Inlet Fish Producers, Inc. (IFP) requested a hearing and protested CINGSA's application for this CLU gas storage.
4. On September 20, 2010 and September 30, 2010, CINGSA electronically submitted to the Commission amendments to its July 27, 2010 application.
5. The Commission held a public hearing on October 19<sup>th</sup> and 20<sup>th</sup>, 2010 at 333 West 7<sup>th</sup> Avenue, Suite 100, Anchorage, Alaska 99501. Testimony was presented by CINGSA and IFP. CINGSA and IFP also submitted written exhibits.
6. The record was held open until October 27, 2010, to permit CINGSA and IFP to provide written additional comments for the hearing record.

**FINDINGS:**

1. Operator  
Marathon Oil Company (Marathon) operates the CLU, which is located within the Kenai Field on the east side of the Cook Inlet, Kenai Peninsula Borough, Alaska. CINGSA anticipates acquiring the proposed Sterling C Pool reservoir from Marathon. As of October 19, 2010 the Alaska Department of Natural Resources had not issued a CLU gas storage lease to CINGSA.

## 2. Injection Strata

The proposed Sterling C Gas Storage Pool is comprised of the C1 and C2 fluvial channel sandstones (in descending order). The proposed injection and storage interval corresponds to the CLU No. 8 well between the measured depths of 6690' and 6945' (see Figure 1, below).

Gross interval thickness for the proposed storage reservoir averages about 200', and net sand thickness averages about 95'. The original structure at the top of the proposed storage reservoir is comprised of a structural, four-way dip closure that was charged by biogenic methane gas.

The CLU is situated along the Aleutian megathrust tectonic plate boundary. The Cannery Loop and the nearby Kenai Gas Fields have produced regularly since 1988 and 1962, respectively, and have not been affected by seismic activity within the Cook Inlet Basin. The nearest known active fault is the West Boundary Fault in Cook Inlet, about 16 miles from the proposed CLU gas storage site. The Cannery Loop Fault is a north-dipping, east-west-trending fault located about 2 miles from proposed CLU surface facilities. Planned wells do not intersect the Cannery Loop Fault and no fault rupture hazard exists.

The CLU earthquake ground motion hazard is similar to that of gas storage areas in southern California, western Washington and Oregon, where wells move with the surrounding soil and rock, and there is no differential displacement. There are no nearby slopes or free faces that would allow lateral spread by liquefaction; none was reported in the CLU area as a result of the 1964 earthquake. No CLU site hazards have been identified that could result from tectonic and local subsidence, tsunami, flooding, slope stability, or volcanic hazards, other than volcanic ash fall.

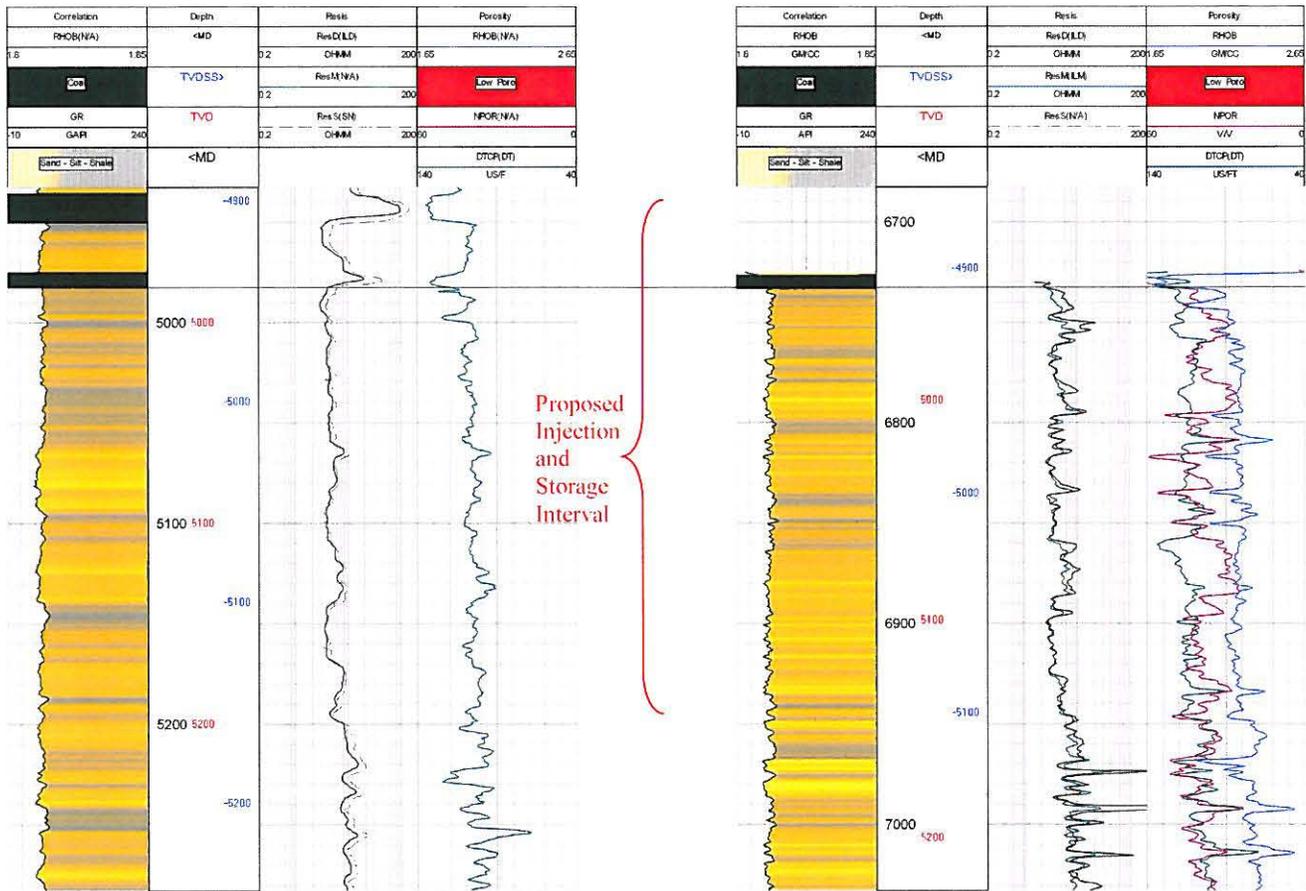
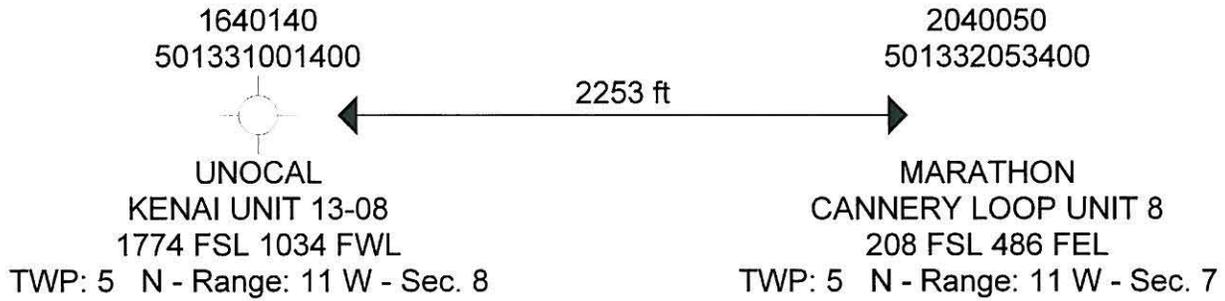
## 3. Pool Information

The Cannery Loop Field contains four separate gas pools. They are, in ascending order: Tyonek D, Upper Tyonek, Beluga, and Sterling Undefined. The youngest, the Sterling Undefined Gas Pool, produces from the C1 and C2 sandstones. These sandstones have been managed as a single reservoir through commingling of multiple perforated intervals within well CLU-06. To date, only the Sterling C interval within the Sterling Formation has had commercial gas development.

The Sterling sandstones are Miocene-Pliocene aged. They are part of a sequence of sandstone, siltstone, mudstone, and coal deposited by large, meandering stream systems. Individual sandstone layers are typically 25' to 50' thick, fine upward, and are separated by coal, siltstone, and shale barriers. The thickest sandstone bodies of the Sterling consist of amalgamated sand sequences deposited in the central portions of meander belts, and can be in excess of 200' thick.

The Sterling sandstones are classified as quartz-rich litharenites that contain little matrix and are slightly cemented with calcite, smectite, and kaolinite. These sandstones are fine- to coarse-grained, angular to subrounded, and moderately well sorted, with porosity ranging from 20% to 35%, and extrapolated permeabilities ranging from 10 to 1000 millidarcies.

The Sterling C sandstones display good reservoir properties and thick, continuous intervening shales (lateral and top seals). They exhibit pressure depletion characteristics with minimal water production (see Finding 13 and Figure 2, below). The proposed interval is an excellent candidate for gas storage.



**Figure 1. Representative Well Logs for the Proposed Sterling C Gas Storage Pool<sup>1</sup>**

<sup>1</sup> Figure 1 is for illustration purposes only. Refer to the well log measurements recorded in CLU No. 8 for the precise representation of the proposed injection and gas storage interval. The horizontal grid lines in this figure represent increments of ten feet measured depth. The acronym TVD refers to true vertical depth, and the acronym TVDSS refers to true vertical depth subsea (true vertical depth below sea level).

4. Proposed Injection Wells

CINGSA has optimized the number of proposed service wells and well completion designs to meet reservoir deliverability and surface facility design requirements. The program proposes five injection/withdrawal service wells, drilled from a single surface pad. The wells will be directionally drilled from a gravel pad to the west/southwest, to target the prospective gas storage reservoir along the crest of a 4-way dip, structural trap. No wells may be drilled absent a Permit to Drill issued by the Commission.

5. Operators/Surface Owners Notification

CINGSA provided an affidavit affirming that all operators and surface owners within one-quarter mile of the storage injection area were notified of CINGSA's subject proposal.

6. Description of Operation

CINGSA proposes to develop Sterling C gas storage in phases. Initially, the storage facility is designed to provide 11 billion cubic feet (BCF) of working gas deliverable in approximately ninety days under maximum withdrawal conditions. The required base-gas volume is estimated to be 7 BCF, which will allow the field to operate efficiently to a minimum surface flowing pressure of about 400 psi. Maximum total gas inventory will be limited to 18 BCF initially (11 BCF working gas + 7 BCF base gas), or 68% of the initial gas in place. The storage facility's maximum injection and withdrawal rates will be limited to 150 million cubic feet per day (MMCFD). Simulation indicates that the storage facility should operate at surface pressures ranging from approximately 400 psi to 1450 psi. The facility is designed such that additional storage capacity can be accommodated.

7. Well Spacing

To simplify well geometry while providing for maximum drawdown, it may be necessary to space the wells as close as 200' apart. Well completion design will stagger perforations stratigraphically among wells in close proximity to enable each well to drain effectively the storage pore volume within its drainage polygon. Well spacing exceptions will be requested as part of CINGSA's applications for Permits to Drill.

8. Well Logs

All logs from existing wells within the CLU were previously submitted to the AOGCC by the field operator. CINGSA intends to acquire logging-while-drilling (LWD) logs in the new injection/withdrawal wells. The minimum logging program will consist of continuous mud logging, gamma-ray for surface and intermediate holes, and triple-combo (gamma-ray, resistivity, neutron, and density) in the production hole. Cement bond logs will be run on the intermediate and production casings. Once acquired, this data will be filed per AOGCC regulations.

9. Proposed Mechanical Integrity and Well Design

All casing strings in new injection/withdrawal wells will be cemented in accordance with AOGCC regulations. An application will be made later with a Permit to Drill for annular disposal of drilling wastes. This will necessitate leaving intermediate casing cement below the surface casing shoe in the subject well. A liner will be run and cemented across the target gas

storage interval and into the intermediate casing. Selective liner perforation will be based on petrophysical analysis of logs to be acquired by LWD across the prospective interval prior to running the production liner. Production liners will include a liner top packer and tie-back seal bore on production tubing to provide isolation/integrity of the reservoir from the annulus. The liner and tubing will utilize "gas tight", metal-on-metal premium connections. A hydraulic-actuated wireline retrievable surface controlled subsurface safety valve (SSSV) will be installed, at an estimated depth of 150'.

Proposed storage injection/withdrawal wells will be tested for mechanical integrity during completion per 20 AAC 25.412. CINGSA will continue monitoring tubing/casing annulus pressures. Abnormal annular pressure in any well will be followed by actions to isolate the well from reservoir pressure. CINGSA will investigate any abnormal pressure occurrence and perform remedial actions as required. Following corrective action, CINGSA will conduct a mechanical integrity test (MIT), witnessed by a commission representative, to re-confirm well mechanical integrity.

10. Fluid Type and Source

CINGSA intends to inject dry natural gas with a typical composition of about 98% methane and specific gravity ranging from 0.56 to 0.58. It is expected that injection gas will generally originate in the greater Cook Inlet region and be transported via the KNPL pipeline.

11. Fluid Compatibility

CINGSA provided analysis of gas from various points throughout the Cook Inlet gas pipeline system. Only compatible gas will be injected into the Sterling C Zone.

12. Injection Rates and Pressures, Fracture Information

CINGSA plans to operate the storage facility between a maximum and minimum field inventory of 18 BCF and 7 BCF, respectively. This equates to a working volume of 11 BCF. At the maximum storage volume of 18 BCF, material balance (P/Z v. cumulative gas production, Figure 2) indicates an average reservoir pressure of approximate 1521 psi.

Modeling indicates that the storage facility will operate at surface pressures ranging from approximately 400 psi to 1450 psi. The injection profile used in the model initiated fill-up at a total injection rate of 150 MMCFD, stepping down to a final rate of 75 MMCFD (for all five wells). The reservoir can thus be filled within a time period of approximately 100 days. The model showed the final injection pressure for individual wells to vary between 1430 psi and 1460 psi. This corresponds to a maximum pressure during injection at the reservoir datum (4966' TVD) of 1610 psi. Even though modeling indicates that a maximum injection pressure of approximately 1450 psi should be sufficient to fill the storage reservoir, actual well performance (due to completion design and efficiency, reservoir heterogeneities, etc.) will likely dictate a higher injection pressure.

Leak off tests were performed in wells CLU-8, CLU-9, and CLU-10 below the 9- 5/8" intermediate casing shoes. In these wells, intermediate casing was set just above the proposed Sterling C storage interval. Following cementing operations, approximately 20 feet of new formation was drilled below the casing shoe and leak off tests performed. Average fracture gradient was 0.684 psi/ft for leak off at the top of the Sterling C interval. This fracture gradient is significantly higher than the proposed Sterling C Gas Pool discovery pressure gradient of

0.444 psi/ft. The original discovery pool gradient was obtained from the initial reservoir pressure of 2206 psi (at a reservoir datum of 4966' TVD), measured in well CLU-6.

CINGSA intends to operate the Sterling C storage facility below the initial reservoir pressure of 2206 psi. The initial phase of development calls for a maximum storage volume of 18 BCF (as compared to the initial gas in place of 26.5 BCF), which, based upon material balance, equates to an average reservoir pressure of approximately 1520 psi. CINGSA intends to limit injection pressure so that the injection pressure gradient does not exceed 0.5 psi/ft at the reservoir datum of 4966' TVD. This equates to a maximum injection pressure of 2200 psi at surface and 2483 psi at 4966' TVD.

13. Underground Sources of Drinking Water

The proposed gas injection reservoir depth is approximately 4900' TVD to 5100' TVD. Aquifer exemption is addressed in a separate commission order (see Aquifer Exemption Order No. 13).

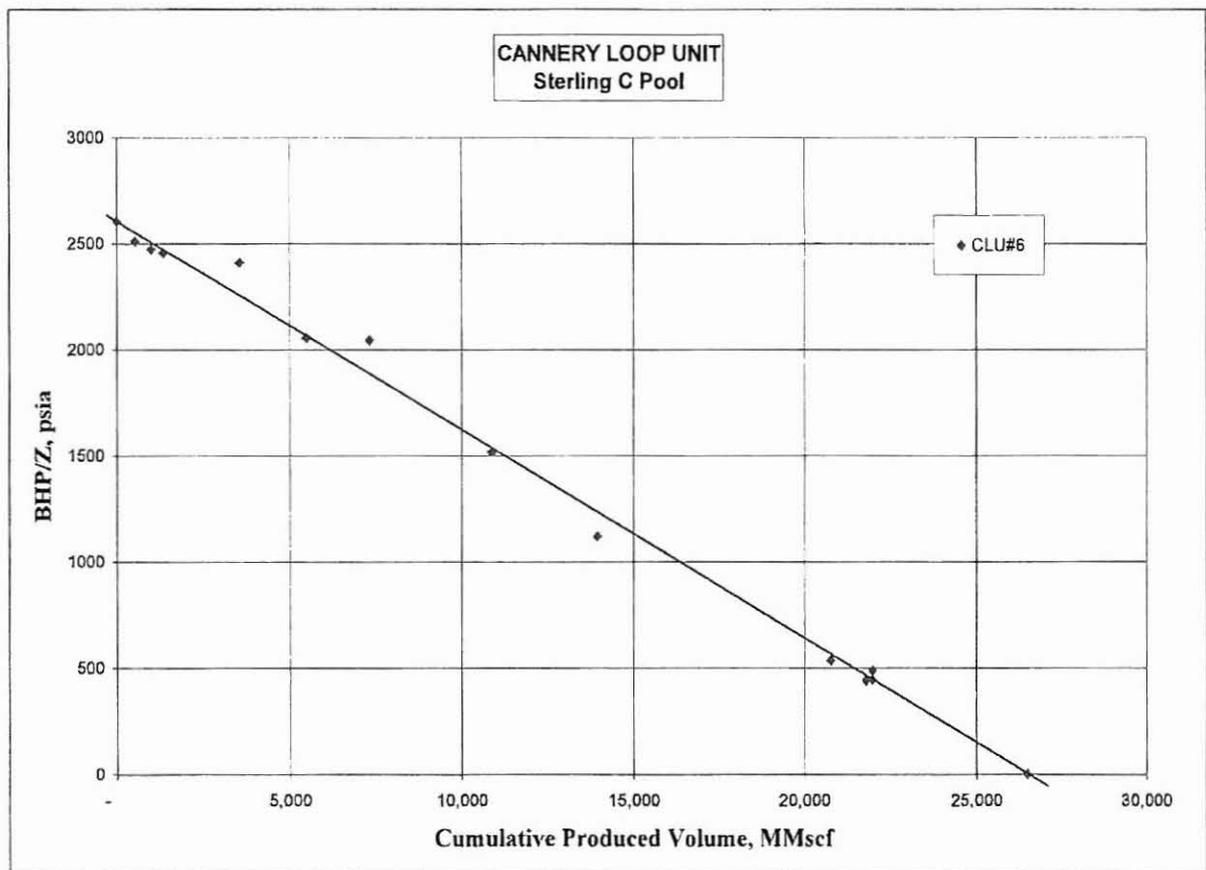


Figure 2: P/Z plot of Cannery Loop Sterling C Reservoirs

14. Mechanical Condition of Pool Wells

Three wells (CLU-06, CLU-08 and CLU-12) within the field require remedial work to isolate the Sterling C storage interval. Remedial procedures will be jointly developed between

CINGSA and Marathon. All necessary well remediation will be conducted in compliance with Commission regulations before injection will commence.

In accordance with existing Commission regulations, KU 13-8 (1964, Unocal exploratory well) was plugged and abandoned with a cement plug set from 1000' to 1270'. The 8-5/8" casing shoe (in 12 1/4" hole) is set at 1159' and cemented in place. 7-5/8" hole was drilled to 5506'. The 7-5/8" well bore was not cased. A sundry reports that this well was left with a 4 foot standpipe and placard marking the abandoned location. CINGSA's investigations have shown that the pipe / marker have since been cut off and plugged, and the well casing stub is now buried below grade. Through recent land and magnetometer surveying efforts, CINGSA has located what appears to be the buried casing.

Drilling and completion activity on CLU-12 (2006, Marathon development well) was suspended when the Beluga objectives were apparently found to be non-viable. The deeper portion of the well was abandoned with numerous cement plugs, leaving the shallower portion of the well as a sidetrack candidate. The 9-5/8" casing shoe (in 12 1/4" hole) is set at 7259' and cemented in place. 8-1/2" hole was drilled to 10415'. The 8-1/2" hole section was not cased. The lower portion of the Sterling C interval and the upper Beluga are not isolated. Remedial procedures which comply with Commission regulations will be jointly developed between CINGSA and Marathon and approvals gained to allow for re-entry to drill out plug #3 and cement from the top of plug #2 into the 9-5/8" casing. This work will insure isolation of the Sterling C interval in this well for gas storage integrity and will be completed as a prerequisite to gas injection.

15. Monitoring

Individual storage injection/withdrawal wells are designed to operate at a maximum rate of approximately 50 MMCFD. To manage risk, CINGSA will install a surface controlled subsurface safety valve (SSSV) in each well. CINGSA will also install a Supervisory Control and Data Acquisition (SCADA) system for the well pad. The SCADA system will include the ability to monitor the pressure, temperature, and gas flow rate at each injection/withdrawal well from a central control room located in the compressor station. Each of the 6" well lateral flow lines and the 16" gathering header will include actuator-equipped isolation valves that will enable each lateral and the gathering header to be shut-in from the well pad gate as well as from the central control room.

CINGSA will monitor daily injection and withdrawal rates and pressures to validate mechanical integrity through material balance monitoring. The Sterling C gas pool has followed a classic P/Z depletion drive curve (Figure 1), indicating no subsurface communication. Forward monitoring of pressures and volumes will provide an additional check on integrity, where data from primary depletion can be compared with data from subsequent injection/withdrawal cycles.

16. Public Comment

IFP submitted written objection to CINGSA's Cannery Loop gas storage proposal, presented oral testimony at a Commission public meeting on September 1, 2010 and at a Commission hearing on October 19 and 20, 2010 and submitted written exhibits during the hearing on October 19 and 20, 2010 and on October 27, 2010. IFP offered testimony and exhibits through two witnesses, Vincent Goddard and Dr. John O. Robertson. Mr. Goddard runs a fish

processing business. Dr. Robertson was qualified to testify as a petroleum engineer. Mr. Goddard's testimony included technical information in geology, geophysics and petroleum engineering. Given Mr. Goddard's lack of expertise in any of these technical areas, the Commission finds his testimony on those matters lacks credibility. Dr. Robertson was qualified to testify as an expert in the area of petroleum engineering. However, the bulk of Dr. Robertson's testimony was offered on the subject of geology and geophysics, areas in which he was not qualified as an expert. As a result, the Commission believes his testimony on those topics lacks credibility. To the extent Dr. Robertson's testimony was in direct conflict with the testimony of experts offered by CINGSA, the Commission finds the testimony of the experts offered by CINGSA to be more credible than that offered by Dr. Robertson.

### **CONCLUSIONS:**

Based upon the evidence and testimony presented, the Commission concludes as follows:

1. The proposed Sterling C Gas Pool storage project meets the requirements of 20 AAC 25.252. However, prior to submission of any application for a Permit to Drill, CINGSA must obtain a gas storage lease and assume operatorship of the proposed gas injection and storage reservoirs within the CLU.
2. There are no compatibility concerns between injected gas and native gas in the proposed Sterling C Gas Storage Pool.
3. Construction records, casing and cementing records, cement bond logs and witnessed mechanical integrity tests will demonstrate the mechanical integrity of proposed injection storage wells and demonstrate that fluids will not move behind casing beyond the gas storage zone.
4. Prior to commencement of any injection activities, CINGSA will demonstrate to the satisfaction of the Commission that all existing pool wells have been appropriately remediated.
5. The proposed injection and storage operations will be conducted in permeable strata, which can reasonably be expected to accept injected fluids at pressures less than the fracture pressure of the confining strata.
6. The injection of natural gas into the proposed Sterling C Gas Storage Pool will not propagate fractures through the confining zones.
7. Aquifer Exemption Order No. 13 separately addresses exemption of aquifers within the project area.
8. Surveillance of operating parameters for storage and offset wells will provide continued assurance that stored gas remains confined to the proposed Sterling C Gas Storage Pool.
9. Limiting the reservoir pressure to 1700 psi for natural gas storage in the proposed Sterling C Gas Storage Pool will insure that storage reservoir pressure remains below original reservoir pressure.
10. The proposed injection of natural gas into the proposed Sterling C Gas Storage Pool for the purpose of storage will not cause waste, jeopardize correlative rights, endanger freshwater, or impair ultimate recovery.

**NOW THEREFORE IT IS ORDERED** that the following rules, in addition to statewide requirements under 20 AAC 25, apply to the underground storage of hydrocarbons by injection operations in the proposed Sterling C Gas Storage Pool, in the affected area described below:

**Seward Meridian Township 05N, Range 11W**

SW1/4-SW1/4 of Section 4  
W1/2-SE1/4-SW1/4 of Section 4  
S3/4-NW1/4-SW1/4 of Section 4  
S1/2-SE1/4 of Section 5  
S3/4-NE1/4-SE1/4 of Section 5  
S1/2-NW1/4-SE1/4 of Section 5  
S1/2-NE1/4-NW1/4-SE1/4 of Section 5  
E1/2-SE1/4-SW1/4 of Section 5  
SE1/4-NE1/4-SW1/4 of Section 5  
E1/2-E1/2-SE1/4 of Section 7  
E1/2 of Section 8  
SW1/4 of Section 8  
S1/2-NW1/4 of Section 8  
E1/2-NE1/4-NW1/4 of Section 8  
SW1/4-NE1/4-NW1/4 of Section 8  
SE1/4-NW1/4-NW1/4 of Section 8  
W3/4-NW1/4 of Section 9  
N1/2-NW1/4-SW1/4 of Section 9  
SW1/4-NW1/4-SW1/4 of Section 9  
NW1/4-SW1/4-SW1/4 of Section 9  
N3/4-W1/2-NE1/4 of Section 17  
N3/4-W1/2-E1/2-NE1/4 of Section 17  
N3/4-E1/2-NW1/4 of Section 17  
NW1/4-NW1/4 of Section 17  
NE1/4-SW1/4-NW1/4 of Section 17  
N1/2-NW1/4-SW1/4-NW1/4 of Section 17  
NE1/4-NE1/4-NE1/4 of Section 18  
NE1/4-SE1/4-NE1/4-NE1/4 of Section 18

**RULE 1: STORAGE INJECTION**

The Commission approves injection for storage of natural gas in the CLU within the interval identified in Rule 2 (below), which constitutes a gas storage pool named the Sterling C Gas Storage Pool.

**RULE 2: POOL DEFINITION**

The Sterling C Gas Storage Pool consists of the interval within the Affected Area that is common to, and correlating with, the measured depths from 6690' to 6945' in well CLU No. 8.

### **RULE 3: GAS DETECTION**

CINGSA shall install, operate and maintain a gas detection and alarm system in all buildings located within 50 feet of the surface location of well KU 13-08, unless prohibited from doing so by either the owner or the lessee of the land upon which KU13-08 is located.

### **RULE 4: WELL REMEDIATION**

CINGSA shall demonstrate that any wells in the pool meet all Commission requirements for hydrocarbon production wells, or that the wells have been suspended or abandoned in accordance with applicable requirements.

### **RULE 5: DEMONSTRATION OF MECHANICAL INTEGRITY**

The mechanical integrity of proposed storage injection wells and existing pool wells must be demonstrated before injection begins, and before returning any well to service following a workover affecting mechanical integrity. A Commission-witnessed mechanical integrity test must be performed after injection is commenced for the first time in any well, to be scheduled when injection conditions (temperature, pressure, rate, etc.) have stabilized. Subsequent tests must be performed on each storage injection well at least once every four years thereafter. The Commission shall be notified at least 24 hours in advance of a test. Unless an alternate means is approved by the Commission, mechanical integrity must be demonstrated by a tubing/casing annulus pressure test using a surface pressure of 1,500 psi or 0.25 psi/ft multiplied by the vertical depth of the packer, whichever is greater. Stabilizing pressure that does not change more than 10 percent during a 30-minute period is required for a valid test. Results of all mechanical integrity tests must be provided to the Commission.

### **RULE 6: WELL INTEGRITY FAILURE AND CONFINEMENT**

The operator shall maintain a continuous data acquisition system to record flow rates and pressures on all active wells in the field. Field personnel must perform daily visual inspections and maintenance of all active wells and production equipment. Whenever any pressure communication, leakage or lack of injection zone isolation is indicated by injection rates, operating pressure observations, tests, surveys, logs, or other evidence, the operator shall notify the Commission by the next business day and submit a plan of corrective action on a Form 10-403 for Commission approval. The operator shall immediately shut in the well if continued operation would be unsafe or would threaten contamination of freshwater, or if so directed by the Commission.

### **RULE 7: MAXIMUM RESERVOIR PRESSURE**

The reservoir pressure for this project shall be limited to a maximum of 1700 psi.

### **RULE 8: PERFORMANCE REPORTING**

The Operator shall report disposition of production and injection as required by 20 AAC 25.228, 20 AAC 25.230, and 20 AAC 25.235. An annual report evaluating the performance of the storage injection operation must be provided to the Commission no later than March 15. The report shall include material balance calculations of the gas production and injection volumes and a summary of well performance data to provide assurance of continued reservoir confinement of the gas storage volumes. Additional data collection and analysis will be based on a review of the operating

performance and could include temperature surveys, pressure surveys, and production logs.

**RULE 9: OTHER CONDITIONS**

- a. It is a condition of this authorization that the operator complies with all applicable Commission regulations.
- b. The Commission may suspend, revoke, or modify this authorization if injected fluids fail to be confined within the designated injection strata, or for any other violation of the law.
- c. As provided in 20 AAC 25.252(j), if storage operations are not begun within 24 months after the date of this Order, the injection approval shall expire unless an application for extension has been approved by the Commission.

**RULE 10: ADMINISTRATIVE ACTIONS**

Unless notice and public hearing are otherwise required, the Commission may administratively waive or amend any rule stated above as long as the change does not promote waste or jeopardize correlative rights, is based on sound engineering and geoscience principles, and will not result in fluid movement outside of the authorized injection zone.

**DONE at Anchorage, Alaska** and dated November 19, 2010.



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Daniel T. Seamount, Jr., Chair  
Alaska Oil and Gas Conservation Commission

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Cathy P. Foerster, Commissioner  
Alaska Oil and Gas Conservation Commission

**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.