



**MEMORANDUM**  
Department of Natural Resources

**STATE OF ALASKA**  
Division of Oil and Gas

**To:** Commissioner Dan Seamount, AOGCC

**Date:** September 8, 2011

**From:** William C. Barron, Director  
Division of Oil and Gas

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**Subject:** Docket OTH-10-16

This memorandum conveys the recommendation from the Division of Oil and Gas for the Alaska Oil and Gas Conservation Commission (AOGCC) to adopt regulations requiring contingency plans for control of well blowouts to be submitted to, and approved by, the AOGCC, with coordinated review of the plans by the Department of Natural Resources (DNR), the Department of Environmental Conservation (DEC), and the Department of Fish and Game (ADF&G).

As the State's recognized experts in well safety, reservoir characteristics and production potential, the AOGCC is uniquely positioned to provide the necessary oversight and approval of blowout contingency plans. We recommend the state implement review and approval criteria for blowout contingency plans, with the AOGCC as the primary regulatory agency for approval authority, with coordinated review by the DNR, DEC, and ADF&G. In particular, the Division recommends AOGCC regulations require site specific blowout contingency plans with detailed criteria for plan contents and defined plan review and approval processes.

The Division of Oil and Gas commends the Alaska Oil and Gas Conservation Commission's recent comprehensive review of their existing oil and gas well regulations and the subsequent request for comments regarding whether any changes were necessary to current AOGCC statutes and regulations. The Division of Oil and Gas appreciates the opportunity to provide comment and recommendations in this matter.