

# STATE OF ALASKA

## ALASKA OIL AND GAS CONSERVATION COMMISSION

SEAN PARNELL, GOVERNOR

333 W. 7th AVENUE, SUITE 100  
ANCHORAGE, ALASKA 99501-3539  
PHONE (907) 279-1433  
FAX (907) 276-7542

### AMENDED ADMINISTRATIVE APPROVAL

#### AREA INJECTION ORDER 2B.053

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

RE: KRU 2D-14 (PTD 1841590) Request for Administrative Approval  
Kuparuk River Oil Pool

Dear Mr. Walters:

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 injection in the subject well. **Specific to this amendment is clarification that testing of the well shut-in equipment linked to the wells outer annulus pressure includes both the shutdown valve and the mechanical or electrical pressure detection device.**

CPAI originally notified the Commission on October 20, 2008 that Kuparuk River Unit (KRU) 2D-14 exhibited intermittent tubing x inner annulus (TxIA) communication. The well has been inactive since June 2008 except for diagnostic testing on several occasions that has not been able to confirm the location of the leak. CPAI requests that the tubing and IA pressures be allowed to equalize at up to 3000 psi. 3000 psi is approximately 60% of the published internal yield of the 7” casing and 85% of the published internal yield of the 9-5/8” surface casing. For similar approvals, automatic shut in equipment tied to the well’s outer annulus pressure that will activate at 1000 psi has been required.

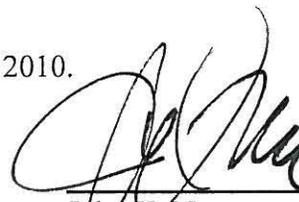
The reported results of CPAI’s diagnostic procedures and wellhead pressure trend plots indicate that KRU 2D-14 exhibits at least two competent barriers to the release of well pressure. Installation of automatic shut in equipment on the well’s outer annulus set to activate at 1000 psi will provide an additional level of protection due to the anticipated high annulus pressure. The Commission finds that the well’s condition does not compromise overall well integrity so as to threaten human safety or the environment.

AOGCC’s administrative approval to continue **water injection only** in KRU 2D-14 is conditioned upon the following:

1. CPAI shall record wellhead pressures and injection rate daily;
2. CPAI shall submit to the AOGCC a monthly report of well pressures, injection rates, and pressure bleeds for all annuli;
3. CPAI shall limit the inner annulus pressure to 3,000 psi and outer annulus pressure to 1,000 psi;
4. CPAI shall install, maintain and operate automatic well shut-in equipment linked to the well's outer annulus pressure. The actuation pressure shall not exceed 1,000 psi. **Testing of the shut-in equipment shut-down valve and mechanical or electrical pressure detection device) shall be performed in conjunction with production well pilots and safety valves. CPAI shall provide to the Commission the testing procedure that will be used to verify the integrity of the well shut-in equipment linked to the outer annulus pressure;**
5. CPAI shall perform a mechanical integrity test of the inner annulus every 2 years to the maximum anticipated injection pressure. The initial MIT should be performed after thermal stabilization when the well is returned to operation;
6. CPAI shall perform a mechanical integrity test of the outer annulus to 1800 psi every 2 years;
7. CPAI shall immediately shut in the well and notify the AOGCC if there is any change in the well's mechanical condition; and
8. After well shut in due to a change in the well's mechanical condition, AOGCC approval shall be required to restart injection.

DONE at Anchorage, Alaska and dated December 13, 2010.

  
\_\_\_\_\_  
Daniel T. Seamount, Jr.  
Chair, Commissioner

  
\_\_\_\_\_  
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.