

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

Re: **THE APPLICATION OF**) Area Injection Order No. 2B.077
CONOCOPHILLIPS ALASKA,)
INC. for Administrative Approval) Kuparuk River Unit
allowing well 1Q-11 (PTD 1841990)) Kuparuk River Field
to be online in water only injection) Kuparuk River Oil Pool
service with tubing x inner annulus)
pressure communication.) April 25, 2013
)

By letter dated April 9, 2013, ConocoPhillips Alaska, Inc. (CPAI) requested administrative approval to continue water only injection in the subject well.

In accordance with Rule 9 of Area Injection Order (AIO) 02B.000, the Alaska Oil and Gas Conservation Commission (AOGCC) hereby **GRANTS** ConocoPhillips Alaska Inc. (CPAI)'s request for administrative approval to continue water only injection in the subject well.

CPAI reported a potential Tubing x Inner Annulus pressure communication to AOGCC on September 23, 2010 and diagnostic testing has confirmed the communication; however it has not been possible to locate the leak. Testing also confirms the communication is one-way, from the tubing (T) to the inner annulus (IA). AOGCC previously issued AIO 2B.058 which was cancelled in July, 2011 due to logistics with the OA High Pressure Pilot (HPP) that was to be installed on the OA.

The AOGCC finds that CPAI does not intend to perform repairs at this time. A passing non-witnessed mechanical integrity test of the Inner Annulus (MITIA) and outer annulus (MITOA) on March 21, 2013 indicates that KRU 1Q-11 exhibits at least two competent barriers to the release of well pressure. Accordingly, the AOGCC believes 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 KRU 1Q-11 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. Bleeds to be flagged on the report;
3. CPAI shall perform a mechanical integrity test of the inner annulus (MITIA) or TxIA CMIT with tubing plug below uppermost packer every 2 years to the maximum anticipated injection pressure;
4. CPAI shall perform a MITOA every 2 years to 1800 psi;

5. CPAI shall limit the well's IA operating pressure to 2000 psi and the OA operating pressure to as low as reasonably possible not to exceed 1000 psi;
6. Within 30 days of the effective date of this approval, 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 1000 psi. Testing of the shut-in equipment (surface safety valve and mechanical or electrical pressure detection device) shall be performed in conjunction with production well pilots and safety valves;
7. CPAI shall immediately shut in the well and notify the AOGCC if there is any change in the well's mechanical condition;
8. After well shut in due to a change in the well's mechanical condition, AOGCC approval shall be required to restart injection; and
9. 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. The Commission 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 April 25, 2013.



for


Cathy P. Foerster
Chair, Commissioner


Daniel T. Seamont, 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. As provided in AS 31.05.080(b), "[t]he questions reviewed on appeal are limited to the questions presented to the AOGCC 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.