



THE STATE  
of **ALASKA**  
GOVERNOR BILL WALKER

## Alaska Oil and Gas Conservation Commission

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### ADMINISTRATIVE APPROVAL AREA INJECTION ORDER NO. 2C.010

Ms. Kelly Lions  
Problem Wells Supervisor  
ConocoPhillips Alaska, Inc.  
P.O. Box 100360  
Anchorage, AK 99510-0360

Re: Docket Number: AIO-15-002  
Request for administrative approval to allow well 1D-38 (PTD 2000770) to be online in water only injection service with a known tubing by inner annulus communication. Kuparuk River Unit (KRU) 1D-38 (PTD 2000770)  
Kuparuk River Field  
Kuparuk River Oil Pool

Dear Ms. Lyons:

By letter dated January 5, 2015, ConocoPhillips Alaska, Inc. (CPAI) requested administrative approval to continue water only injection in the subject well.

In accordance with Rule 11 of Area Injection Order (AIO) 02C.000, the Alaska Oil and Gas Conservation Commission (AOGCC) hereby **GRANTS** 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 July 20, 2014 while the well was shut in. The well was previously on gas injection. CPAI performed diagnostics while on gas and the passing non-state witnessed Mechanical Integrity Test of the Inner Annulus (MITIA) on July 21, 2014 indicates that 1D-38 exhibits at least two competent barriers to the release of well pressure. CPAI WAG'ed the well to water after receiving permission from AOGCC. The well does not exhibit signs of pressure communication while on water injection and passed a follow up state witnessed MITIA on August 26, 2014. 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 1D-38 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 every 2 years to the maximum anticipated injection pressure;
4. CPAI shall limit the well's IA operating pressure to 2000 psi and the OA operating pressure to 1000 psi;
5. CPAI shall immediately shut in the well and notify the AOGCC if there is any change in the well's mechanical condition;
6. After well shut in due to a change in the well's mechanical condition, AOGCC approval shall be required to restart injection; and
7. The MIT anniversary date is August 26, 2014.



**DONE at Anchorage, Alaska and dated January 8, 2015.**

Cathy P. Foerster  
Chair, Commissioner

Daniel T. Seamount, Jr.  
Commissioner

David Mayberry  
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.