



THE STATE
of **ALASKA**
GOVERNOR BILL WALKER

Alaska Oil and Gas Conservation Commission

333 West Seventh Avenue
Anchorage, Alaska 99501-3572
Main: 907.279.1433
Fax: 907.276.7542
www.aogcc.alaska.gov

ADMINISTRATIVE APPROVAL AREA INJECTION ORDER NO. 3.030

Mr. Doug Cismoski
Well Intervention Manager
BP Exploration (Alaska), Inc.
P.O. Box 196612
Anchorage, AK 99519-6612

Re: Docket Number: AIO-15-040
Request for administrative approval to allow well P-10A (PTD 2150660) to be online in water only injection service with a known tubing by inner annulus communication.
Prudhoe Bay Unit (PBU) P-10A (PTD 2150660)
Prudhoe Bay Field
Prudhoe Oil Pool

Dear Mr. Cismoski:

By letter dated August 28, 2015, BP Exploration (Alaska) Inc. (BPXA) requested administrative approval to continue water only injection in the subject well.

In accordance with Rule 9 of AIO 3.000, the Alaska Oil and Gas Conservation Commission (AOGCC) hereby **GRANTS** BPXA's request for administrative approval to continue water only injection in the subject well.

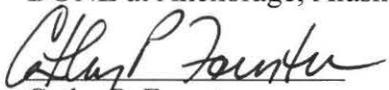
PBU P-10 developed a slow tubing by inner annulus pressure communication and on December 18, 2006 the AOGCC issued AIO 3.013. AOGCC determined that water injection could safely continue if BPXA complied with the restrictive conditions set out in AA AIO 3.013.

BPXA has performed a P&A of P-10 and a coil tubing sidetrack creating well P-10A (PTD 2150660) in late May 2015 per Sundry Approval number 315-211. AA AIO 3.013 is no longer necessary to the operation of P-10 or P-10A and was cancelled on August 20, 2015. After the sidetrack, BPXA completed a passing state witnessed Mechanical Integrity Test of the Inner Annulus (MITIA) on August 28, 2015 which indicates that P-10A exhibits at least two competent barriers to the release of well pressure. The well does not exhibit signs of pressure communication while on water injection. Accordingly, the AOGCC believes that the well's condition does not compromise overall well integrity so as to threaten human safety or the environment.

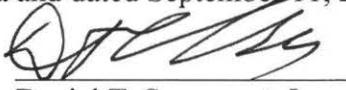
AOGCC's approval to continue water injection only in PBU P-10A is conditioned upon the following:

1. BPXA shall record wellhead pressures and injection rate daily;
2. BPXA 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. BPXA shall perform a mechanical integrity test of the inner annulus every 4 years to the maximum anticipated injection pressure;
4. BPXA shall limit the well's IA operating pressure to 2000 psi and the OA operating pressure to 1000 psi;
5. BPXA 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 28, 2015.

DONE at Anchorage, Alaska and dated September 11, 2015.



Cathy P. Foerster
Chair, Commissioner



Daniel T. Seamount, 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.

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.