



THE STATE  
of **ALASKA**  
GOVERNOR BILL WALKER

## Alaska Oil and Gas Conservation Commission

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### ADMINISTRATIVE APPROVAL AREA INJECTION ORDER NO. 4F.006

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

Re: Docket Number: AIO-15-052  
Request for administrative approval to allow well 13-17 (PTD 1820260) to be online in water alternating gas (WAG) injection service with a shallow packer depth (cemented inner annulus).  
Prudhoe Bay Unit (PBU) 13-17 (PTD 1820260)  
Prudhoe Bay Field  
Prudhoe Oil Pool

Dear Mr. Cismoski:

By letter dated December 1, 2015, BP Exploration (Alaska), Inc. (BPXA) requested administrative approval to continue WAG injection in the subject well.

In accordance with Rule 9 of Area Injection Order (AIO) 4F.000, the Alaska Oil and Gas Conservation Commission (AOGCC) hereby **GRANTS** BPXA's request for administrative approval to continue WAG injection in the subject well.

BPXA reported a potential production casing leak at 9467 ft to AOGCC in 2011 and the well was shut in. BPXA performed diagnostics and performed a tubing punch (10070 ft to 10075ft and 10218 ft to 10220 ft) and cement squeeze of the inner annulus under Sundry 315-108 in June 2015. The cement top was estimated at 3220 ft, with the upper injection perforation located at 11054 ft. BPXA performed a passing waterflow log on November 30, 2015 which indicates no upward movement of fluid in the IA across the cemented interval. However, since the inner annulus is cemented leaving only approximately 3200 ft of inner annulus available for monitoring, this annulus does not meet the requirement that an injection well be equipped with a packer set not more than 200' measured depth above the top of the perforations.

If injection does not occur into, through, or above freshwater, 20 AAC 25.450 authorizes less stringent well construction and integrity requirements if AOGCC determines the reduction in requirements will not result in an increased risk of movement of fluids into freshwater.

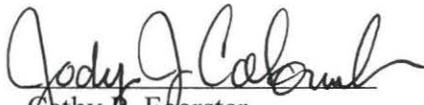
BPXA completed a passing non-state witnessed Mechanical Integrity Test of the Tubing (MITT) on August 19, 2015 and a passing non-state witnessed Mechanical Integrity Test of the Inner Annulus (MITIA) on October 3, 2015 which indicates that 13-17 exhibits at least two competent barriers to the release 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 WAG injection in PBU 13-17 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 2 years to the maximum anticipated injection pressure;
4. BPXA shall perform a mechanical integrity test of the tubing every 2 years to the maximum anticipated injection pressure;
5. BPXA shall limit the well's IA operating pressure to 2000 psi;
6. BPXA shall immediately shut in the well and notify the AOGCC if there is any change in the well's mechanical condition;
7. After well shut in due to a change in the well's mechanical condition, AOGCC approval shall be required to restart injection; and
8. The MIT anniversary date is October 3, 2015.

DONE at Anchorage, Alaska and dated December 7, 2015.



*for*  
  
Cathy R. 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.

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.