



**ADMINISTRATIVE APPROVAL  
AREA INJECTION ORDER NO. 9.011**

Ms. Ajibola A. Adeyeye  
Operations Engineer – Western Division  
XTO Energy, Inc.  
P.O. Box 6501  
Englewood, Colorado 80155

Re: Request for administrative approval to allow well MGS A33-11 (PTD 1852350) to be online in water only injection service with a production casing communication.  
Middle Ground Shoal (MGS) Unit A33-11 (PTD 1852350)  
Middle Ground Shoal Field  
Middle Ground Shoal Oil Pool

Dear Ms. Adeyeye:

By letter dated September 30, 2014, XTO Energy Inc. (XTO) requested administrative approval (AA) to continue water only injection in the subject well.

In accordance with Rule 9 of AIO 09.000, the Alaska Oil and Gas Conservation Commission (AOGCC) hereby **GRANTS** XTO's request for administrative approval to continue water only injection in the subject well.

XTO reported a potential production liner pressure communication to AOGCC on December 3, 2013. XTO completed additional testing and has determined the upper packer is probably leaking allowing communication to the top perforation in the production liner, while the bottom packer is holding pressure therefore isolating the injection to the injection zone. XTO has determined the communication, although minor, is sufficient to prevent a passing determination of the standard mechanical integrity test of the inner annulus (MITIA). 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 MGS A33-11 is conditioned upon the following:

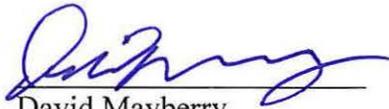
1. XTO shall record wellhead pressures and injection rate daily;
2. XTO shall submit to the AOGCC a monthly report of well pressures, injection rates, and pressure bleeds for all annuli. Bleeds to be flagged on the report;

3. XTO shall perform a mechanical integrity test of the tubing (MIT-T) every 2 years against a wireline plug set below the packer to the maximum anticipated injection pressure;
4. XTO shall perform a leak detection log, or water flow log, or temperature survey every two years to demonstrate production casing integrity;
5. XTO shall immediately shut in the well and notify the AOGCC if there is any change in the well's mechanical condition;
6. After the well is 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 January 3, 2014.

**DONE** at Anchorage, Alaska and dated October 3, 2014.



Cathy P. Foerster  
Chair, 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.