

# STATE OF ALASKA

SARAH PALIN, GOVERNOR

## ALASKA OIL AND GAS CONSERVATION COMMISSION

333 W. 7th AVENUE, SUITE 100  
ANCHORAGE, ALASKA 99501-3539  
PHONE (907) 279-1433  
FAX (907) 276-7542

### ADMINISTRATIVE APPROVAL DIO 18.001

Ms. MJ Loveland  
Well Integrity Project Supervisor  
ConocoPhillips Alaska Inc.  
P.O. Box 100360  
Anchorage, AK 99510-0360

RE: Surveillance Frequency – Request for Administrative Approval

Dear Ms. Loveland:

Pursuant to Rule 6 of Disposal Injection Order (“DIO”) 18.000, the Alaska Oil and Gas Conservation Commission (“AOGCC” or “Commission”) hereby grants ConocoPhillips Alaska Inc. (“CPAI”)’s request for administrative approval to reduce the frequency of surveillance logging and fill depth tag requirements to not less than once every two years.

By letter dated May 6, 2007 CPAI requested the Commission reduce the required frequency of surveillance logging and fill depth tags to a biennial cycle for Colville River Unit well WD-02 (PTD 198-258). DIO 18, Rule 5 currently requires such surveillance “at least once annually or as warranted following consultation with the Commission.” Well WD-02 is carries approvals for underground injection from the Commission (UIC Class II) and the Environmental Protection Agency (UIC Class I).

The Commission findings based on a review of this request and Commission well files include the following:

1. Well WD-02 has been used primarily for the disposal injection of Class I and Class II wastes generated in conjunction with the Alpine Field development;
2. Sound well integrity and confinement of injected wastes has consistently been demonstrated through daily well performance monitoring, well integrity testing, and surveillance logging;
3. The Environmental Protection Agency modified its UIC Class I permit (No. AK-11003-A) based on historical mechanical integrity demonstrations, reducing the frequency of surveillance logging and fill depth tag requirements from an annual cycle to a biennia cycle;

4. The risk of damage to the wellbore and resulting operational problems may be reduced with less frequent well interventions;
5. Consistency among all disposal wells will minimize both confusion and duplication of effort regarding surveillance requirements; and
6. There are no underground sources of drinking water underlying the Colville River Unit.

Performance monitoring of injection operations associated with Colville River Unit Well WD-02 provides an accurate and timely assessment of any potential well integrity problems. Reducing the frequency of surveillance logging and fill depth tags will not compromise overall well integrity so as to threaten the environment or human safety.

Accordingly, DIO 18, Rule 5 is hereby amended to provide as follows:

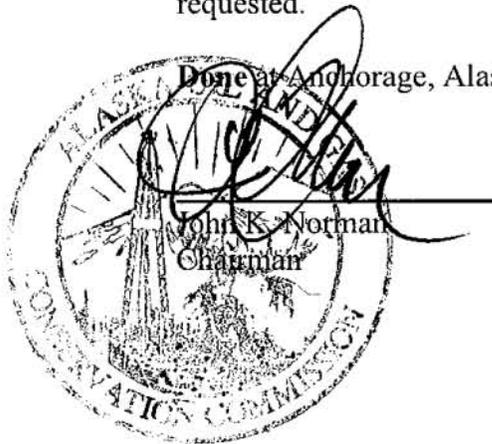
Rule 5, Surveillance

A baseline temperature survey from surface to total depth, initial step rate test to pressures equal or exceeding maximum injection pressure and pressure falloff are required prior to initiation of regular disposal injection. Regular fill depth tags and surveillance logging are required at least once every two years or as warranted following consultation with the Commission. Operating parameters including disposal rate, disposal pressure, annulus pressures and volume of solids pumped must be monitored and reported according to requirements of 20 AAC 25.432.

Submittal of an annual performance report will be required on or about July 1 of each year. The report shall include rate and pressure performance, a volumetric analysis of the disposal storage interval, an estimate of fracture growth, if any, and updates of operational plans. If completed, results of logging, fill depth, or other surveillance surveys designed to document disposal injection performance and confinement of injected fluids shall also be included in the annual report.

As provided in AS 31.05.080, within 20 days after written notice of this decision, or such further time as the Commission grants for good cause shown, a person affected by it may file with the Commission an application for rehearing. A request for rehearing is considered timely if it is received by 4:30 PM on the 23rd day following the date of this letter, or the next working day if the 23rd day falls on a holiday or weekend. A person may not appeal a Commission decision to Superior Court unless rehearing has been requested.

Done at Anchorage, Alaska and dated August 3, 2007.



  
Daniel T. Seamount, Jr.  
Commissioner

  
Cathy P. Foerster  
Commissioner