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May 3, 2022

HAND DELIVERED

Mr. Jeremy M. Price
Chair, Commissioner
Alaska Oil and Gas Conservation Commission
333 West Seventh Avenue, Suite 100
Anchorage, Alaska 99501-3572

Subject: Docket Number OTH-22-012
Gas Release
Colville River Unit, CD1 Drillsite

Dear Commissioner Price:

On behalf of ConocoPhillips Alaska, Inc. ("CPAI"), the purpose of this letter is to provide a final written report in connection with the above-referenced matter pursuant to 20 AAC 25.205(b) and in further response to the March 11, 2022 letter from the Alaska Oil and Gas Conservation Commission ("AOGCC"). On March 25, 2022, AOGCC agreed to an extension of the deadline for this submission to today, May 3, 2022. Thank you for your courtesy in allowing for additional time to respond.

AOGCC regulations at 20 AAC 25.205(b) require a final written report detailing the following facts:

- (1) the time of the incident;
- (2) the location where the incident took place;
- (3) the volumes of oil and gas released and recovered;
- (4) the cause of the release;
- (5) responsive actions taken to prevent additional releases;
- (6) plans, actions, equipment, or procedural changes to prevent or minimize the risk of future releases.

AOGCC's March 11, 2022 letter provided further that the "final incident report . . . must include CPAI's interpretation of results as they relate to gas source, path, volume or causality."

In accordance with 20 AAC 25.205(b):

With respect to (1), **Attachments A and B** include the time of the incident.

With respect to (2), **Attachments A and B** include the location where the incident took place.

With respect to (3), **Attachment C** includes the estimated volume of gas released into subsurface strata under CD1 before flow was routed through the WD-03 outer annulus ("OA") into the Alpine Central Facility ("ACF"), starting March 8, 2022. As reported to AOGCC in Situation Report No. 15, source control was achieved as of March 29, 2022, when WD-03 stopped producing gas through the ACF upon circulation of kill weight fluid. Based on metering data from the flow directed through the WD-03 OA to the ACF from March 8, 2022, through March 29, 2022, the volume of gas recovered is estimated at 24 million cubic feet ("MMCF").

With respect to (4), **Attachment A** includes CPAI's incident investigation report to the AOGCC addressing the cause of the release.

With respect to (5), **Attachments D-F** include the responsive actions taken to prevent additional releases.

With respect to (6), **Attachment A** includes plans, actions, equipment, or procedural changes to prevent or minimize the risk of future releases.

In accordance with the additional criteria set forth in AOGCC's March 11, 2022 letter, **Attachments A and C** include CPAI's interpretation of results as they relate to gas source, path, volume or causality.

Attachments A-F include the following:

Attachment A includes CPAI's incident investigation report to the AOGCC, which addresses the time of the incident; (2) the location where the incident took place; (4) the cause of the release; and (6) plans, actions, equipment, or procedural changes to prevent or minimize the risk of future releases. The report further includes CPAI's interpretation of the results as they relate to gas source, path, volume, or causality.

Attachment B includes the preliminary written report produced by CPAI to AOGCC on March 9, 2022, pursuant to 20 AAC 25.205(b), which included (1) the time of the incident; (2) the location where the incident took place; and (5) preliminary information regarding responsive actions taken to prevent additional releases.

Attachment C includes a letter produced by CPAI to AOGCC on April 1, 2022, pursuant to 20 AAC 25.300, which included (3) the estimate of the volume of natural gas released (with duration specified) that was attached to Situation Report No. 19. The letter further includes CPAI's interpretation of the results as they relate to volume.

Attachment D includes "Alpine CD1 Response" update reports posted by CPAI to alpineresponse.com dating from March 4, 2022, through the present, which includes (5) responsive actions taken to prevent additional releases.

Attachment E includes "Alpine CD1 Natural Gas Release Situation Reports" produced by CPAI to AOGCC, dating from March 15, 2022, through the present, which includes (5) responsive actions taken to prevent additional releases.

Attachment F includes e-mail updates produced by CPAI to AOGCC in regards to "Docket OTH-22-012: Gas Release Colville River Unit, CD1 Drillsite," dating from March 14, 2022, through the present, which includes (5) responsive actions taken to prevent additional releases. In addition to these routine written updates, a technical representative from AOGCC was actively engaged with the Company's Incident Management Team since March 8, 2022, serving as a direct conduit between the IMT and AOGCC during the incident response.

CPAI is committed to taking the corrective actions identified in the attached incident investigation report; to keeping AOGCC apprised of its progress in doing so; and to continuing to work with the AOGCC in furtherance of protecting the public health, safety, and the environment.

Sincerely,



Greg Hobbs
Regulatory Engineer
ConocoPhillips, Alaska

Attachments A-F