



March 28, 2023

To: Alaska Operators

Re: Docket Number: OTH-23-008
Notice to Operators
Rush requests for Applications for Permit-to-Drill and Sundry Approval

Please take a moment to communicate this courtesy memorandum to staff involved in permitting drilling and well activities.

The Alaska Oil and Gas Conservation Commission (AOGCC) strives to process Permit to Drill (10-401) and Application for Sundry Approvals (10-403) in a timely fashion. All efforts are made to honor the “**Approximate Spud Date**” on the 10-401 and the “**Estimated Date for Commencing Operations**” on the 10-403. Timeliness is secondary to technical review, completeness, and accuracy of permit applications to assure they meet regulatory compliance, assuring well integrity, safety, and conservation of resource. The internal process includes a review by a Petroleum Engineer, a Reservoir Engineer, and a Petroleum Geologist as well as final review by at least two Commissioners.

This review process sometimes results in a discussion between the AOGCC staff and the applicant signatory or designee or a request for additional information. Conditions of approval are often added to applications. Note that staff commonly correct “clerical” errors that may be the result of “cutting and pasting”, correct inconsistencies with data on record, correct Conservation Order references when inappropriate, and correct other such deficiencies without rejecting an application. All is done in the name of timeliness.

Despite these efforts, “rush” sundries seem to have become more common. Whereas every situation is unique and occasionally a legitimate rush situation does occur, poor planning does not constitute a rush situation. In certain cases, staff are authorized to give verbal approvals to provide continuity of activity. But when paperwork is required before activity can commence, please note that staff are compensated for a standard work week. Friday and weekend deadlines seem to constitute the highest concentration of “rush” requests. The AOGCC is staffed appropriately, reflecting routine activity levels covered by the Regulatory Cost Charge. There is no additional compensation to staff that must work on their time off to process a rush request.

As such, the AOGCC is requesting cooperation regarding appropriate planning times for permit compliance. The agency will make every effort to avoid disruption of operations. But please note that the AOGCC will also be exercising renewed scrutiny and discretion to process a “rush” request.

Brett W.
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W. Huber, Sr.
Date: 2023.03.28
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Brett W. Huber, Sr
Chair, Commissioner

Jessie L.
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L. Chmielowski
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Jessie L. Chmielowski
Commissioner

Gregory
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Gregory C. Wilson
Commissioner