

Alaska Oil and Gas Association



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Kara Moriarty, Deputy Director

May 20, 2010

Commissioner Dan Seamont
Alaska Oil & Gas Conservation Commission
333 W. 7th Avenue, Suite 100
Anchorage, AK 99501

Re: Proposed Changes to 20 AAC 25.215 – 20 AAC 25.265 – Well
Safety Valve System Requirements

Dear Commissioner Seamont:

The 14 members of the Alaska Oil & Gas Association (AOGA) account for the majority of oil and gas exploration, development, production, transportation, refining and marketing activities in the state. Thank you for the opportunity to comment on the current set of proposed regulation changes to 20 AAC 25.265, Well Safety Valve System Regulations, which were dated April 15, 2010.

A considerable amount of time and resources have been spent by the Alaska Oil and Gas Conservation Commission (AOGCC) and industry in carefully developing and evaluating new regulations regarding well safety valve systems. Throughout this process, AOGA has submitted extensive comments and testimony, and we appreciate the Commission's consideration of our input to the process. Many of our previous recommendations have been incorporated into the current set of proposed regulations. While most of the major issues have been addressed, the attached red-line contains comments on six remaining items.

We look forward to the completion of this process. It is our understanding that prior to new regulations becoming effective AOGCC will consolidate the "legacy" guidance documents and letters into a new guidance document. In addition, conservation orders containing references to safety valve systems will be reviewed and may be changed. As we have in prior testimony and communications, AOGA respectfully requests industry be involved in the development of the new guidance document. Further, we would like to request that individual operators be consulted prior to changing safety valve system requirements in specific conservation orders.

We will provide oral testimony to speak to our suggestions at the June 8, 2010 public hearing. Please contact me if you have any questions.

Sincerely,

A handwritten signature in black ink that reads 'Kara Moriarty'. The signature is written in a cursive, flowing style.

KARA MORIARTY
Deputy Director

Cc: Commissioner John Norman
Commissioner Cathy Foerster