

Via E-Mail May 29, 2017

Becky Kruse (becky.kruse@alasa.gov)
Petroleum Land Manager
DNR, Division of Oil and Gas
550 W. 7th Avenue, Suite 1100
Anchorage, Alaska 99501



MAY 3 0 2017

DIVISION OF OIL AND GAS

RE: Kitchen Lights Unit, Unit Plan of Development Minor Amendment to 4th Plan of Development

Dear Ms. Kruse,

Furie Operating Alaska, LLC ("Furie") is requesting a minor amendment to its 4th Plan of Development ("POD"), dated October 7, 2016 and approved by the Division on December 8, 2017.

The following language is proposed to be amended on page 4 of the POD at "4. PROPOSED 2017 KLU DEVELOPMENT", as follows:

(iii) As an alternative to the development well described in (ii), Furie may either conduct further drilling and evaluation of the KLU #4 exploration well location or drill and evaluate the KLU #6-Deep Jurassic exploration well as described below.

The following language is proposed to be amended on page 5 of the POD at "5. PLANS FOR EXPLORATION OR DELINEATION OF LANDS OUTSIDE PA", as follows:

As an alternative to the development well described in (ii), Furie proposes the following substitute work commitment for exploration activities in 2017:

Provided Furie has enough time and conditions safely permit, on or before December 30, 2017, use commercially reasonable efforts to drill and acquire sufficient logs and data to evaluate either the KLU #4 well or the KLU #6-Deep Jurassic well to a depth sufficient to penetrate the Sunfish Channel of the Tyonek Formation.

Both the KLU #4 and KLU #6-Deep Jurassic wells are proposed as straight holes (same surface and bottom hole geographic locations). The surface locations are described in the DNR Unit Plan of Operations, Letter of Non-Objection, dated May 25, 2017 (attached). Thank you for your time and consideration.

Best Regards,

Bruce Webb Sr. Vice President

Furie Operating Alaska, LLC

cc: Tony Nunes and Jon Iversen

FOURTH PLAN OF DEVELOPMENT

KITCHEN LIGHTS UNIT

OCTOBER 7, 2016

Furie Operating Alaska, LLC Operator

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1. OBJECTIVE

This Fourth Plan of Development for the Kitchen Lights Unit (KLU) is submitted by Furie Operating Alaska, LLC (Furie) as Operator on behalf of itself and the other working interest owners to the Department of Natural Resources (DNR) pursuant to Article 8 of the Kitchen Unit Agreement and 11 AAC 83.343. The Third Plan of Development called for the following activities in 2016:

- Delivery of a jack-up rig to Alaska waters on or before May 15, 2016;
- On or before November 30, 2016, drill and acquire all necessary logs and data to properly evaluate two new development wells in the Corsair block to the stratigraphic equivalent of the deepest sand that was flow tested and determined to be commercially viable in the KLU #3 well, namely the sand encountered from 6964 feet to 6998 feet measured depth in the KLU #3 well, unless the Director finds that interpretations from the shallower data in a well indicate that producible hydrocarbons are unlikely to be found by drilling to that equivalent horizon depth;
- Based on the logs and data acquired from the new development wells, develop a plan for completing the wells and present the plan to DNR;
- Use commercially reasonable efforts, weather permitting, to complete, by December 31, 2016, one new development well in the Corsair block.

In addition, DNR proposed modifications to the 2016 Plan of Development, which were included as commitments:

- Within 60 days of the approval of the Third Plan of Development, provide a revised Exhibit A to the Kitchen Lights Unit Agreement;
- By September 1, 2016, complete seismic interpretation for the entire KLU and provide bottom hole locations for exploration and development wells;
- Within 30 days of the date of the approval of the Third Plan of Development, provide DNR with evidence that Furie secured the use and contracted the delivery of the jack-up rig.

Furie has met or will meet these commitments in a timely manner. The Randolph Yost jack-up rig was delivered well before May 15, 2016. Furie then drilled the KLU #A2 well to 7038' MD / 5210' TVD. Based on the logs, the KLU #A2 well was plugged back and sidetracked at 2290' MD. Furie then drilled the KLU #A2-A to 8160' MD / 7301' TVD, logged and completed the well, and is currently producing the well. In addition, Furie has commenced drilling the KLU #A1 well, with an eye toward completing it in 2017. Furie plans to present the well results of these wells to DNR along with the plan to complete the KLU #A1.

Furie also met the modifications to the Third Plan of Development that were proposed by DNR. Furie provided a revised Exhibit A and evidence that the use and delivery of the rig was secured in a timely manner. Per correspondence with DNR on August 30, 2016, Furie has obtained seismic data covering the entire KLU and although initial interpretation is complete, the analysis of the data is ongoing and will continue for some time. Furie has submitted proposed well locations as part of the plan of operations process and in the interest of consistency Furie does

not see a need to revise any well locations stated in the plan of operations at this time. Please note that the wells referenced in the plan of operations are at this point intended to be vertical wells such that the bottom hole locations will coincide with the coordinates provided in the plan of operations. In any event, as previously discussed in regard to the plan of operations, the proposed schedule of wells and their exact locations will likely evolve.

The objective of this Fourth Plan of Development is to:

- Continue the safe and effective development of the proven gas reserves in the KLU;
- Continue and increase production of natural gas on the Julius R Platform;
- Continue the pragmatic exploration of the KLU.

2. RESERVOIR CHARACTERISTICS AND MANAGEMENT

2.1 Reservoir Characteristics

The geologic formations that Furie has been targeting are the Sterling and the Beluga formations. Multiple pools within the Sterling and Beluga formations have been identified by well logs as being productive. Of the multiple pools identified, 28 had MDT log evaluations (19 different sand test points) and five have been flow tested to date (4 of which were proven to be economically viable). Gas samples contained 99% methane. One or more of the tested horizons may be shown to be in communication with other horizons within the same formation.

2.2 Reservoir Management

The KLU #3, and KLU #A2-A are natural gas wells. The KLU #3 well has been in commercial production since November of 2015. The KLU #A2-A well has been completed and is currently producing. Numerous layers of pay were encountered in the Sterling and Beluga formations. The proposed development is designed to efficiently exploit these pools by completing the wells at various intervals. The more prolific Sterling reservoirs may be exploited in the first development wells to increase reserves and deliverability.

Based on well tests of three of the twenty-one intervals evaluated to have significant hydrocarbon deposits, the initial well is anticipated to produce approximately 15-18 million cubic feet per day. If analyses indicate that the well will support increased flow rates, production may be increased. Initial production is expected to be dry gas. Gas samples taken during well testing were approximately 99% methane. Water content is expected to increase as the reservoir is produced. As each producing zone becomes depleted or uneconomic to produce, that zone will be isolated and another zone introduced into production.

A portion of the produced gas will be utilized on the platform for production operations.

3. WELLS AND DRILLING

Initial production has been from the KLU #3 well. The KLU #A2-A well was drilled and completed in 2016 and is currently producing. The platform is designed to accommodate up to four additional wells, for a total of six wells. Additional wells will be drilled as appropriate to maximize recovery from the reservoir. Well workovers will also be performed as appropriate during the life of the field.

Wells have been and will continue to be drilled using a jack-up rig brought to the site for that purpose, and the platform will support a workover rig (platform rig) that may be used for well completions and maintenance. When needed, the workover rig (platform rig) will be transported to the platform and installed using the platform crane, then removed after completion of the well work.

Development wells will be directionally drilled to penetrate development prospects using conventional drilling techniques. The wells will be completed as results justify with single and dual completions. The Beluga and shallower formations will typically be completed with gravel packs.

4. PROPOSED 2017 KLU DEVELOPMENT

With the installation and completion of the platform, subsea pipeline, and onshore production facility, and ongoing production from the KLU #3 well, development will focus on additional wells for increased reserves and deliverability. However, existing natural gas market constraints through 2019 may have an impact on the necessity of multiple wells.

Accordingly, Furie proposes the following work commitments for development activities in 2017:

- (i) On or before November 30, 2017, complete the KLU #A-1 well if advisable based on logs, data and market conditions
- (ii) On or before November 30, 2017, drill and acquire all necessary logs and data to properly evaluate one new development well in the Corsair block to the stratigraphic equivalent of the Sterling flow tested zones in the KLU #3 well, namely the sand encountered from 6964 feet to 6998 feet measured depth in the KLU #3 well, unless interpretations from the shallower data in a well indicate that producible hydrocarbons are unlikely to be found by drilling to that equivalent horizon depth. Based on the logs and data acquired from the new development well, develop a plan for completing the well and present the plan to DNR.
- (iii) As an alternative to the development well described in (ii), Furie may conduct further drilling and evaluation of the KLU #4 exploration well as described below.

5. PLANS FOR EXPLORATION OR DELINEATION OF LANDS OUTSIDE PA

As an alternative to the development well described in (ii), Furie proposes the following work commitment for exploration activities in 2016:

Provided Furie has enough time and conditions safely permit, on or before December 30, 2016, use commercially reasonable efforts to drill and acquire sufficient logs and data to evaluate the KLU #4 well to a depth sufficient to penetrate the Sunfish Channel of the lower Tyonek Formation.



Department of Natural Resources

DIVISION OF OIL AND GAS

550 W. 7th Avenue Suite 1100 Anchorage, Alaska 99501-3560 Main: 907.269.8800 Fax: 907.269.8939

May 25, 2017

Bruce Webb Senior Vice President Furie Operating Alaska, LLC 188 W Northern Light Blvd. Anchorage, AK 99503

RE: LOCI 16-001, Furie, Kitchen Lights Unit, KLU #6 Deep Jurassic Well Conversion/Renaming and Commencement of 2017 Drilling Program, Letter of Non-Objection

Dear Mr. Webb:

The Division of Oil and Gas has received your letter of non-objection request dated April 4, 2017 for the above referenced 2017 drilling program schedule and updated well names.

In your April 4, 2017 letter, Furie notified the Division of two well name changes, one well location change and is requesting a Letter of Non-Objection as required in the LOCI 16-001 Plan prior to drilling in 2017. For future reference, the Division understands that the LOCI 16-001, "Deep Jurasic" well has been renamed "KLU#6, Deep Jurasic" and that the LOCI 16-001, "KLU#6" well is now named "KLU#13."

After review of the planned well name and location change for the (KLU #6, Deep Jurassic) and the request from Furie Operating Alaska LLC (Furie) for start-up of the attached proposed "2017 Proposed Drilling Schedule," the Division finds that Furie has met the requirement specified within the original approval issued on 5/20/2016 for annual approval in advance of drilling operations (identified in section II. Scope of Decision).

Please consider this correspondence as the Letter of Non-Objection for the KLU#6, Deep Jurasic 2017 drilling season. This Non-Objection should not be considered Non-Objection for future annual drilling schedule requests. Please attach this Letter of Non-Objection to the original decision.

A person affected by this decision may appeal it, in accordance with 11 AAC 02. Any appeal must be received within 20 calendar days after issuance of the decision, as defined in 11 AAC 02.040(c) and (d) and may be mailed or delivered to the Commissioner, Department of Natural Resources, 550 W 7th Avenue, Suite 1400, Anchorage, Alaska 99501; faxed to 1-907-269-8918, or sent by electronic mail to dnr.appeals@alaska.gov. This decision takes effect immediately. If no appeal is filed by the appeal deadline, this decision becomes a final administrative order and decision of the department on the 31st day after issuance. An eligible

person must first appeal this decision in accordance with 11 AAC 02 before appealing this decision to Superior Court. A copy of 11 AAC 02 may be obtained from any regional information office of the Department of Natural Resources.

Any questions or concerns about this letter of Non-Objection may be directed to Natural Resource Specialist John Easton at (907) 269-8815 or emailed to John. Easton@alaska.gov.

Sincerely,

Kim Kruse

Permitting Manager

Attachments: Figures 1-2

cc: DOG: Kim Kruse, Jeanne Frazier, John Easton, Becky Kruse

DMLW: Henry Brooks, Cliff Larson

ADF&G: Marla Carter, Virginia Litchfield

ADEC: Graham Wood, dec.water.oilandgas@alaska.gov

AOGCC: James Regg

Fig 1: 2017 Proposed Drilling Schedule

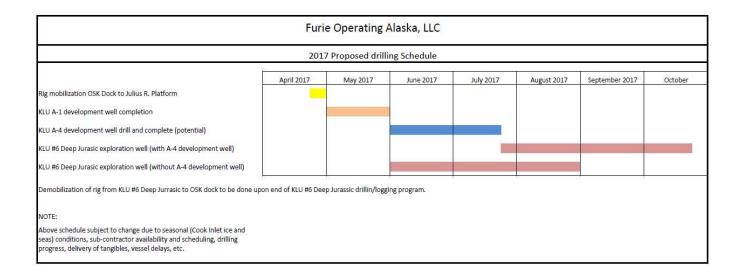


Fig 2: Well Locations

