

## **ADMINISTRATIVE APPROVAL AIO 5.007**

Mr. Steve Lambert  
Reservoir Engineer  
Unocal Alaska  
P.O. Box 196247  
Anchorage, AK 99519-6247

RE: Trading Bay Unit G-29RD [aka Grayling 29RD] (PTD 192-052)  
Request for Administrative Approval AIO 5

Dear Mr. Lambert:

By letter dated September 14, 2005, Unocal Alaska (“Unocal”) requested that the Alaska Oil and Gas Conservation Commission (“AOGCC” or “Commission”) grant an administrative approval per Rule 9 of Area Injection Order (“AIO”) 5, to continue water injection into the subject well without complete mechanical integrity. After review, the Commission hereby grants Unocal’s request for administrative approval for water injection in the subject well.

AOGCC finds the following:

1. This well was originally reported to have experienced tubing x inner annulus (“T x IA”) communication in May 2005 and was shut-in.
2. On May 25, 2005 Unocal applied by Sundry application to return the well to injection so that diagnostic logging could be performed in support of an administrative approval.
3. Following review of available information, Unocal’s application was approved on June 6 subject to recording and submitting the daily injection rate and well pressure information and performing a subsequent temperature survey.
4. Actual injection did not begin until mid July. While injecting, Unocal has been recording daily injection rate and well pressures and has provided this information to the Commission. In support of this application, Unocal has submitted a baseline and subsequent temperature log.
5. Based upon analysis of the submitted logging information, there are no temperature anomalies indicated. The rate/pressure information has not indicated any further pressure integrity loss.
6. At this time, Unocal is not proposing to repair the well to restore full integrity.

7. An aquifer exemption is in effect for all aquifers lying directly below McArthur River Field (Trading Bay Unit) [40 CFR 147.102(b)(2)(ii)].

Based on analysis of the submitted information, the Commission concludes that TBU G-29RD exhibits two competent barriers to release of well pressure. Accordingly, the Commission believes that the well's condition does not compromise overall well integrity so as to threaten the environment or human safety.

AOGCC's administrative approval to continue water injection in Trading Bay Unit G-29RD [aka Grayling 29RD] is conditioned upon the following:

1. Injection is limited to WATER ONLY;
2. Unocal shall monitor and record wellhead pressures [T/I/O] (tubing/inner annulus/outer annulus) and injection rate daily and submit this information to the Commission monthly;
3. Unocal shall perform a temperature log every two years to demonstrate continued production casing integrity;
4. Unocal shall immediately shut in the well and notify the AOGCC upon any measurable change in well outer annulus pressure or any change in the rate/pressure relationship for the TxIA; and
5. After well shut in, AOGCC approval shall be required to restart injection.

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 this 23<sup>rd</sup> day of September, 2005.

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John K. Norman  
Chairman

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Cathy P. Foerster  
Commissioner