

## **ADMINISTRATIVE APPROVAL AIO 6.003**

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

RE: Granite Point State 18742 #5 [aka Anna #5] (PTD 167-014)  
Request for Administrative Approval AIO 6

Dear Mr. Martin:

Per Rule 9 of Area Injection Order (“AIO”) 006, the Alaska Oil and Gas Conservation Commission (“AOGCC” or “Commission”) hereby grants Unocal Alaska. (“Unocal”)’s request for administrative approval for water injection in the subject well.

AOGCC finds the following:

1. The subject well is not completed with a packer and there is no plan to workover the well to install a packer.
2. Several similarly equipped wells on Anna Platform were previously converted to service wells beginning in 2000 according to a procedure developed by Unocal and approved by the Commission.
3. In support of this application, Unocal has submitted the results of temperature logs obtained prior to initiating injection and approximately 10 weeks later. These operations were conducted according to Sundry permit 04-318. They have also submitted a graphical maximum operating pressure determination.
4. Based upon analysis of the submitted logging information, there are no temperature anomalies indicated.
5. Unocal has also begun reporting injection rate and pressure information on the well. The pressure information indicates that the reservoir pressure in Anna 5 is low and insufficient to support a fluid column to surface. The successive pressure information gathered with the temperature surveys indicates that the bottomhole pressure in the vicinity of the well is increasing.
6. Examination of the well file and production history indicates that as best can be determined the well structure is sound and that 2 competent casing barriers exist to prevent the release of pressure or fluids.

7. An aquifer exemption is in effect below Cook Inlet for Granite Point Field [40 CFR 147.102(b)(2)(i).]

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 Granite Point State 18742 #5 [aka Anna #5] is conditioned upon the following:

1. The effect date for conversion from producer to injector is the date injection commenced according to Sundry permit 304-318, October 24, 2004. Unocal shall file form 10-404 noting the changed status of the well.
2. Injection is limited to WATER ONLY;
3. Unocal shall monitor and record wellhead pressures [T/I/O] (tubing/inner annulus/outer annulus) and injection rates daily;
4. Unocal shall submit to the AOGCC a monthly report of well pressures and injection rates;
5. Unocal shall perform a temperature log every two years to demonstrate continued production casing integrity;
6. 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 tubing/IA; and
7. 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 and dated March 29, 2005.

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John K. Norman  
Chairman

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Daniel T. Seamount, Jr.  
Commissioner