

**ADMINISTRATIVE APPROVAL AIO 6.008**

Mr. Larry Greenstein  
Production Technician  
Unocal Alaska  
P.O. Box 196247  
Anchorage, AK 99519-6247

RE: Granite Point State 18742 #19 [aka Anna #19] (PTD 168-006)  
Request for Administrative Approval AIO 6

Dear Mr. Greenstein:

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 a “standard” tubing/packer completion.
2. The well was converted to injection service late 1998. From the record, it appears pressure communication has been present since the well was converted.
3. Since conversion, Unocal has been recording daily injection rates and well pressures and has been reporting this information to the Commission monthly. In support of this application, Unocal has submitted the results of temperature logs obtained in compliance with the conversions Sundry permit and a graphical maximum operating pressure determination. Prior to this action, Unocal was authorized to keep Anna 19 in service via sundry 303-043 approved April 15, 2003.
4. Based upon analysis of the submitted log information, there are no temperature anomalies indicated. The monthly rate/pressure information has not indicated any further pressure integrity loss.
5. At this time, Unocal is not proposing to repair the well to restore full integrity.
6. An aquifer exemption is in effect below Cook Inlet for Granite Point Field [40 CFR 147.102(b)(2)(i).]

Based on analysis of the submitted information, the Commission concludes that Anna 19 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 Granite Point State 18742 #19 [aka Anna #19] 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 tubing/IA; 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 and dated March 29, 2005.

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John K. Norman  
Chairman

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Daniel T. Seamount, Jr.  
Commissioner