

November 21, 1990

ADMINISTRATIVE APPROVAL NO. AIO 9.3-A

Re: Amend Rule 6 of Area Injection Order (AIO) No. 9

R G Blackburn
Manager, Alaska Operations
Shell Western E&P Inc
601 West 5th Ave Suite 810
Anchorage, AK 99501-2257

Dear Mr Blackburn:

Shell Western E&P Inc (SWEPI), as operator of the central portion of the Middle Ground Shoal (MGS) field, by letter of October 23, 1990, requested modification to Rule 6 of AIO No. 9 to allow the use of any EPA approved alternative method to be considered by the Commission for determining mechanical integrity (MI) of Class II wells. The Commission has determined that there are four EPA alternative national testing methods pursuant to 40 CFR 146.8(d): (1) the temperature log, (2) the noise log, (3) the timed-run radioactive tracer survey, and (4) the oxygen activation method.

Therefore, as provided by "Rule 9 Administrative Relief", Rule 6 is amended to read:

Rule 6 Demonstration of Tubing/Casing Annulus Mechanical Integrity

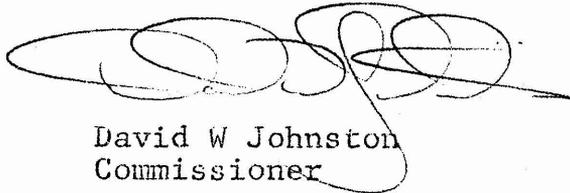
- a. A schedule must be developed and coordinated with the Commission which ensures that the tubing/casing annulus for each injection/disposal well is pressure tested prior to initiating injection and at least once every four years thereafter. A test surface pressure of 1500 psi or 0.25 psi/ft multiplied by the vertical depth of the packer, whichever is greater, but not to exceed a hoop stress greater than 70% of the casing's minimum yield strength, must be held for 30 minutes with no more than a 10% decline.

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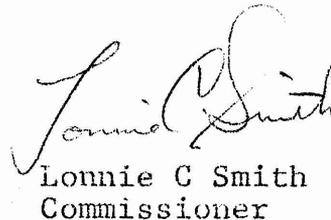
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- b. As an alternative, [with Commission approval,] injection /disposal wells may be surveyed-tested to verify that fluids injected are confined to designated injection strata using an EPA approved method [a timed-run radioactive tracer survey (RTS)] every other year for wells with tubing-to-casing pressure communication. [and every fourth year for wells which demonstrate mechanical integrity.] The proposed test method and detailed operations program shall be submitted to the Commission for approval on Form IO-403 prior to testing the well.
- c. The Commission must be notified at least 24 hours in advance to enable a representative to witness [pressure] the test[s or the running of RTS].

Sincerely,



David W Johnston
Commissioner



Lonnie C Smith
Commissioner