

TELECOPY NO:  
(907)276-7542

May 20, 1988

A D M I N I S T R A T I V E   A P P R O V A L   N O .   A I O   1 3 . 1

Re: Relief from Rules 4 and 5 and amend Rule 6 of Area Injection Order (AIO) No. 13 to accommodate Swanson River Unit Wells 21-33 WD and 41-33 WD.

D. S. Joiner  
Engineering Manager  
Cook Inlet/New Ventures  
ARCO Alaska, Inc.  
P. O. Box 100360  
Anchorage, AK 99510-0360

Dear Mr. Joiner:

ARCO Alaska, Inc. (ARCO), as operator of the Swanson River Field (SRF) by letter dated April 28, 1988 requested modification of AIO No. 13 rules to accommodate SRU wells 21-33 WD and 41-33 WD. These two Swanson River wells were recompleted in May 1972 and October 1971 (respectively) by cementing the tubing in place; therefore, casing pressure testing, monitoring, and reporting, as required by AIO No. 13, can not be accomplished. ARCO has asked for administrative relief from the requirements of Rules 4 and 5 and approval to use an alternative test method to accomplish the purposes of Rule 6.

Swanson River Unit wells 21-33 WD and 41-33 WD had been recompleted by cementing the tubing in place and were operating as disposal wells approved by the EPA at the time the UIC Class II program in Alaska was taken over by the Alaska Oil and Gas Conservation Commission (AOGCC). Therefore, these wells are accepted "as is" by the AOGCC under "Rule 3 Fluid Injection Wells," item (3). As provided by Rule 9, "Administrative Relief" the operator is hereby relieved of the requirements to monitor and report tubing/casing annulus pressures under Rules 4 and 5 but must continue to monitor and report tubing pressures and injection rates as required by 20 AAC 25.432.

The Commission has determined that timed-run radioactive tracer surveys (RTS) offer appropriate means for demonstrating mechan-

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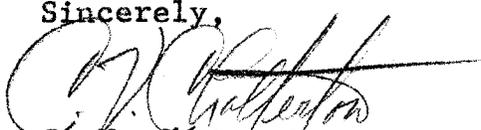
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ical integrity of an underground injection well. Therefore, as provided by "Rule 9 Administrative Relief", Rule 6 is amended to read:

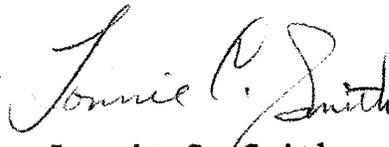
Rule 6 Demonstration of Tubing/Casing Annulus Mechanical Integrity

A schedule must be developed and coordinated with the Commission which ensures that the tubing/casing annulus for each injection 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. As an alternative, with Commission approval, injection wells may be surveyed using timed-run radioactive tracer survey (RTS) every other year. The Commission must be notified at least 24 hours in advance to enable a representative to witness pressure tests or the running of RTSS.

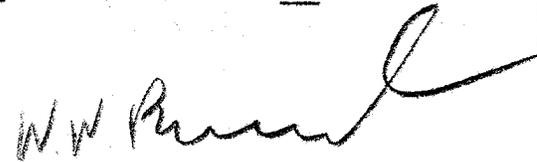
Sincerely,



C. V. Chatterton  
Chairman



Lonnie C. Smith  
Commissioner



W. W. Barnwell  
Commissioner

BY ORDER OF THE COMMISSION

dlf:3.AA AIO 13