

June 19, 1991

ADMINISTRATIVE APPROVAL AIO NO. 13.2

Re: Amendment to Rule 6 of Area Injection Order (AIO) No. 13 to allow alternative methods of demonstrating mechanical integrity.

T Wellman
Regional Engineer
Cook Inlet Region
ARCO Alaska, Inc.
P. O. Box 100360
Anchorage, AK 99510-0360

Dear Mr. Wellman:

By letter dated June 17, 1991 ARCO Alaska, Inc. (ARCO), as operator of the Swanson River Field requested that the Commission amend Rule 6 of Area Injection Order No. 13 to allow oxygen activation logs, temperature logs and noise logs as alternate methods of demonstrating tubing/casing annulus mechanical integrity in Swanson River wells.

The Commission has determined that these logs when run as approved by the Environmental Protection Agency (EPA) under 40 CFR Part 146.8 and the Federal Register Notice - Volume 56, Number 2, February 1, 1991 offer appropriate means for demonstrating mechanical integrity of an underground injection well.

Therefore, as provided by "Rule 9 Administrative Relief," Rule 6 as amended by Administrative Approval AIO No. 13.1 on May 20, 1988 is further 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 methods approved with certain limitations by the U.S. EPA may also be used, with Commission approval; [INJECTION WELLS MAY BE SURVEYED USING] they include but are not limited to timed-run radioactive tracer surveys (RTS) [EVERY OTHER YEAR], oxygen activation logs (OAL), temperature logs (TL) and noise logs (NL). Wells with tubing-to-casing communication, or no tubing annulus must be surveyed or logged every other year and wells which demonstrate mechanical integrity every fourth year. The Commission must be notified at least 24 hours in advance to enable a representative to witness pressure tests or the running of RTS, OAL, TL or NL.

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Sincerely,

Lonnie C. Smith
Commissioner

BY ORDER OF THE COMMISSION

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