

December 20, 1988

A D M I N I S T R A T I V E A P P R O V A L A I O N O . 2 . 4

Re: Amendment to Rule 6 of Area Injection Order (AIO) No. 2 to allow Radioactive Tracer Surveys (RTS) as an alternate method of demonstrating mechanical integrity.

M L Hagood, Manager
Kuparuk Operations Eng
ARCO Alaska, Inc
P O Box 100360
Anchorage, AK 99510-0360

Dear Mr Hagood:

ARCO Alaska, Inc (ARCO), as operator of the Kuparuk River Field (KRF), by letter dated December 13, 1988, requested that the Commission amend Rule 6 of Area Injection Order No. 2 to allow the radioactive tracer survey (timed-run log) as an alternate method of demonstrating tubing/casing annulus mechanical integrity in Kuparuk River wells.

The Commission has determined that timed-run radioactive tracer surveys (RTS) offer appropriate means for demonstrating mechanical integrity of an underground injection well.

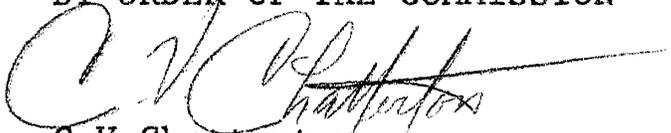
Therefore, as provided by "Rule 9 Administrative Relief", Rule 6 is amended to read:

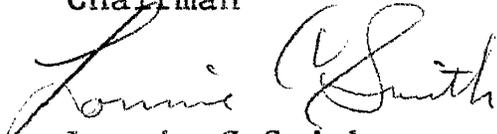
Rule 6 Demonstration of Tubing/Casing Annulus Mechanical Integrity

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 a timed-run radioactive tracer survey (RTS) every other year for wells with tubing-to-casing communication, and every fourth year for wells which demonstrate mechanical integrity. The Commission must be notified at least 24 hours in advance to enable a representative to witness pressure tests or the running of RTS's.

Sincerely,

BY ORDER OF THE COMMISSION


C V Chatterton
Chairman


Lonnie C Smith
Commissioner

jo/3.AA AIO 2