



August 16, 2013

**AOGCC Industry Guidance Bulletin No. 10-02A
Mechanical Integrity Testing**

The Alaska Oil and Gas Conservation Commission (AOGCC) provides the following clarification of injection well mechanical integrity pressure test (MIT) requirements set forth in 20 AAC 25.252 and 25.402. Injection orders supplement AOGCC regulations by providing additional operating and testing obligations.

MIT Preparation

- The AOGCC must be notified at least 24 hours in advance (48 hours for wells remote from the nearest AOGCC office) for an opportunity to witness the MIT;
- Pumping into and bleeding pressures from annuli should be avoided for 24 hours prior to the MIT; if necessary, information should be available to document such activity;
- The well's annulus must be fluid packed before the AOGCC Inspector arrives;
- Calibrated pressure gauges with suitable range and accuracy must be installed on the tubing, inner (tubing by casing) annulus, and outer (casing by casing) annuli; current calibration should be evident with proper labels or other documentation;
- Suitable flow measurement equipment should be available to determine the volume of fluids pumped into and returned from the tested space;
- Other equipment (e.g., tanks, lines, bleed trailers, etc.) necessary for the safe pressure testing and suitable for the operating environment should be rigged up prior to AOGCC Inspector arrival at the location.

The following information must be available at the location for AOGCC Inspector review:

- Valid approved waivers, if any, relating to the integrity of the tested well;
- Current well schematic;
- Graph of tubing, inner annulus, and outer annulus pressures for the preceding 90 days.

Equipment Pressure Rating

Equipment subject to test pressure must have a rated working pressure that meets or exceeds the planned test pressure. API defines the rated working pressure of equipment to be the maximum internal pressure that the equipment is designed to contain or control.

Test Cycle

After the initial MIT, Class II disposal wells injecting solid slurries (used muds, cuttings, produced sand, etc.) require an MIT once every 2 years; otherwise, MITs must be conducted once every 4 years. Injection wells used for enhanced recovery operations must be tested once every 4 years. The AOGCC may, in its discretion, approve an alternate MIT schedule.

A 2- or 4-year MIT means the test must be performed not later than the 2- or 4-year anniversary of the test month, unless a specific anniversary date for the MIT has been established by AOGCC approval (e.g., Area Injection Order administrative approval). For example, a test due August 14, 2014 would – under the new “test month” approach - be allowed to be tested not later than August 30, 2014. Operators are encouraged to take advantage of operating efficiencies in scheduling groups of MITs, and to initiate scheduling early in the month to increase inspector availability and allow time for retesting or unplanned events. The AOGCC must be provided the opportunity to witness the MIT for a test to establish a new test due date. The AOGCC may require a witnessed test to be rescheduled to accommodate workload priorities.

A pre-injection MIT performed prior to demobilizing a drilling rig from a well should be documented on the AOGCC’s MIT Form 10-426 and emailed to the AOGCC addressees noted on the test report form.

Test Pressure

Unless otherwise required by the AOGCC, an MIT of the inner annulus is required to a minimum pressure of 1500 psi or a pressure determined by multiplying 0.25 psi per foot times the true vertical depth of the packer – whichever is greater. A minimum pressure differential of 500 psi should be maintained between the tested annulus and tubing or adjacent annulus. The operator has the discretion to test to a higher pressure. A passing MIT will have no more than a 10 percent decline in pressure (based on the actual test pressure), a stabilizing pressure trend, and a final pressure that is at or above the required test pressure. For example, the operator may choose to start a required 1500 psi test at or above 1650 psi (additional 150 psi to allow for the 10 percent pressure decline over test duration).

Reporting

Unless otherwise required by the AOGCC, MIT results must be verified by an operator’s designated representative and submitted electronically using Form 10-426 to the AOGCC no later than the 5th calendar day of the month following the testing.

Shut-in Wells

The AOGCC's preference is to witness an MIT while a well is actively injecting and wellbore conditions (rate and temperature) are stable. If the well is in a short-term shut-in status when the MIT is due, the AOGCC should be notified and provided an alternate date for testing based on when injection will be recommenced. Injection wells that are shut in long-term (undetermined when injection will restart) need not be tested until they are ready to recommence injection. In lieu of an MIT for the long term shut-in well, the operator must provide to the AOGCC a quarterly graph of tubing, inner annulus and outer annulus pressures.

Please share this Guidance Bulletin with all appropriate members of your organizations. Questions or discussion regarding this guidance bulletin should be directed to Chris Wallace at (907) 793-1250.

Sincerely,



Cathy P. Foerster
Chair, Commissioner