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- (12) Amerada has demonstrated that the proposed injection wells will be installed and operated in accordance with the Division's requirements for conversion to injection wells, and therefore should not adversely affect wells located within the ½-mile "area of review".
- (13) The unitized interval in the proposed waterflood expansion area is in an advanced state of depletion and is suitable for waterflooding.
- (14) The application of Amerada for expansion of the NMGSAU by the conversion of two additional wells to injection wells should be approved.
- (15) The proposed waterflood expansion should result in the recovery of otherwise unrecoverable oil and will not cause waste or impair correlative rights.
- (16) The operator should take all steps necessary to ensure that the injected water enters only the unitized interval and is not permitted to escape to other formations of onto the surface from injection, production or plugged and abandoned wells.
- (17) Injection into the proposed injection wells should be accomplished through 2 3/8-inch plastic lined tubing set in a packer located within 100 feet of the uppermost injection perforations or casing shoe.
- (18) The casing-tubing annulus in each well should be loaded with an inert fluid and equipped with a pressure gauge at the surface or left open to the atmosphere to facilitate detection of leakage in the casing, tubing or packer.
- (19) Prior to commencing injection operations into the wells, the casing should be pressure tested from the surface to the packer setting depth to ensure the integrity of the casing.
- (20) The injection wells or system should be equipped with a pressure limiting device that will limit the wellhead pressure to no more than 0.2 psi per foot of depth to the uppermost injection perforation.
- (21) The Director of the Division may authorize an increase in injection pressure upon a proper showing by the operator of the well that such higher pressure will not result in migration of the injected fluid from the unitized interval. Such proper showing shall consist of a valid step-rate test run in accordance with and acceptable to the Division.