

Statewide Rule 13 Highlights

"Casing, Cementing, Drilling Well Control, and Completion Requirements"

Workshop abbreviated for 08-13-2014

Our Mission



To serve Texas by

- our stewardship of natural resources and the environment,
- our concern for personal and community safety, and
- our support of enhanced development and economic vitality for the benefit of Texans.

Intent of Rule 13

13(a)(1)



- Securely anchor casing in the hole to effectively control the well at all times
- Isolate and seal off all useable quality water zones to prevent contamination
- Isolate all productive zones, potential flow zones and zones with corrosive formation fluids to prevent vertical migration of fluids (including gases) behind pipe.

Definitions 13(a)(2)



- Zone of critical cement for surface casings
- Zone of critical cement for intermediate or production casings
- Protection depth
- Productive zone
- Potential flow zone
- Corrosive fluid zone

Zone of Critical Cement



For surface casing strings ...

- ... the bottom 20% of the casing string, but no more than 1,000 feet nor less than 300 feet.
- The zone of critical cement extends to the land surface for surface casing strings of 300 feet or less.

Zone of critical cement



For intermediate or production casing strings ...

... the bottom 20% of the casing string or 300 vertical feet above the casing shoe or top of the highest proposed productive zone, whichever is less.

Protection Depth



Depth to which usable-quality water (BUQW) must be protected, as determined by the Groundwater Advisory Unit of the Oil and Gas Division, which may include zones that contain brackish or saltwater (USDW), if such zones are correlative and/or hydrologically connected to zones that contain usable-quality water.

*GAU may recommend a protection depth to cover zones that contain TDS concentrations greater than 3,000 ppm based on water use in the area. GAU will consider new data (e.g., new log data) if you believe protection depth should be adjusted.

Protected Aquifers



For oil and gas wells

- fresh water (less than 1,000 mg/l total dissolved solids,TDS) and
- usable quality water (less than 3,000 mg/l TDS, waters known to be used, and waters identified by the Texas Water Development Board for use in desalination).

For saltwater disposal wells in addition to above

 underground source of drinking water (less than 10,000 mg/l)

*GAU may recommend a protection depth to cover zones that contain TDS concentrations greater than 3,000 ppm based on water use in the area. GAU will consider new data (e.g., new log data) if you believe protection depth should be adjusted.

Productive Zone



Any stratum known to

- contain oil, gas, or geothermal resources in
- commercial quantities in the area.

Potential Flow Zone



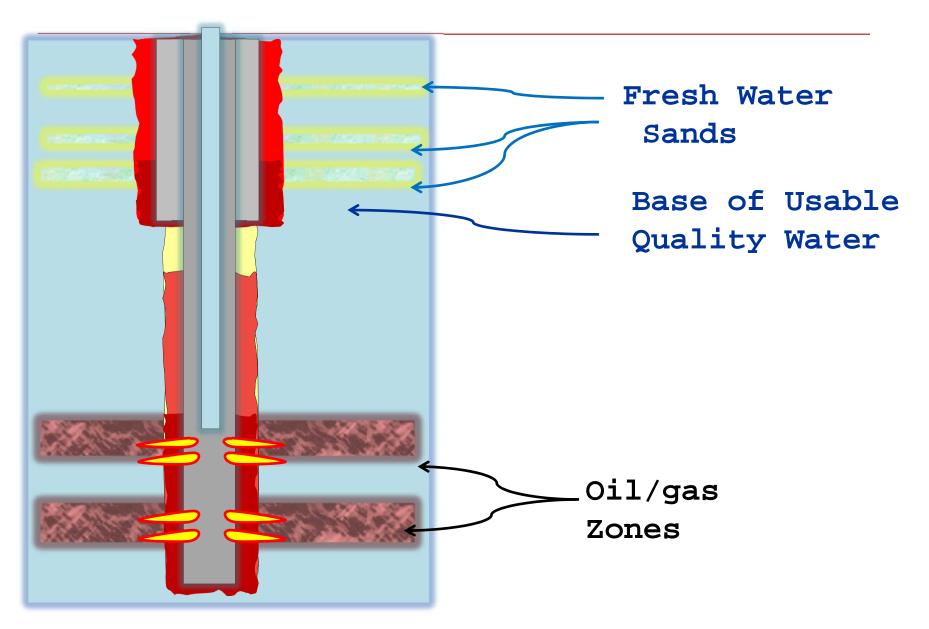
- A zone ... to be isolated to prevent
- sustained pressurization of the surface casing / intermediate casing or production casing annulus sufficient to
- cause damage to casing and/or cement in a well such that it presents
- a threat to subsurface water or oil, gas, or geothermal resources.

Corrosive Fluid Zone



- Any zone ... containing formation fluids that are capable of negatively impacting the integrity of casing and/or cement or
- have a demonstrated **trend of failure** for similar casing and cement design **in the field.**





Surface Casing Requirements



- Set sufficient casing to isolate all defined usable-quality water strata
- Surface casing must be **cemented**
- Cement must be circulated to surface

Critical Zone Cement



Compressive Strength

- Surface casing strings must be allowed to stand under pressure until the cement has reached a compressive strength of at least 500 psi in the zone of critical cement before drilling plug or initiating a test.
- The cement mixture in the zone of critical cement shall have a 72-hour compressive strength of at least 1,200 psi.

Critical Zone Cement



Free-water Content

 Free water content shall be minimized to the greatest extent practicable in the cement slurry to be used in the zone of critical cement. In no event shall the free water separation average more than two milliliters per 250 milliliters of cement

Filler Cement



Compressive Strength

 An operator may use cement with volume extenders above the zone of critical cement to cement the casing from that point to the ground surface, but in no case shall the cement have a compressive strength of less than 100 psi at the time of drill out nor less than 250 psi 24 hours after being placed.

Filler Cement



Free-water Content

 No greater than six milliliters per 250 milliliters of cement tested outside the zone of critical cement.

Better Quality Cement



The Commission may require a better quality of cement mixture to ...

- prevent pollution,
- isolate productive zones, potential flow zones, or zones with corrosive formation fluids or
- prevent a safety issue in the well.

Alternative Surface Casing Requirements §13(b)(2)(G)

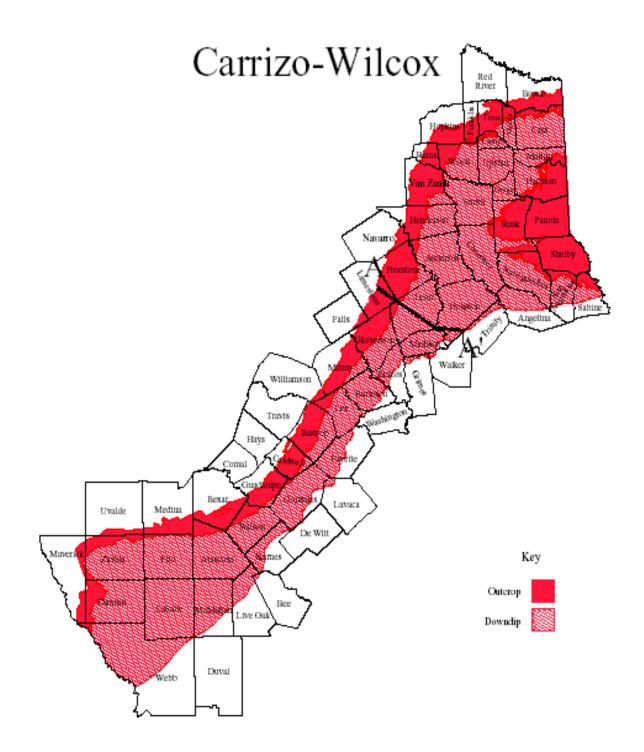


- Operator may request authority to set more or less casing than the required protection depth
- Alternative programs require approval by the appropriate District Director

Alternative Surface Casing Requirements §13(b)(2)(G)

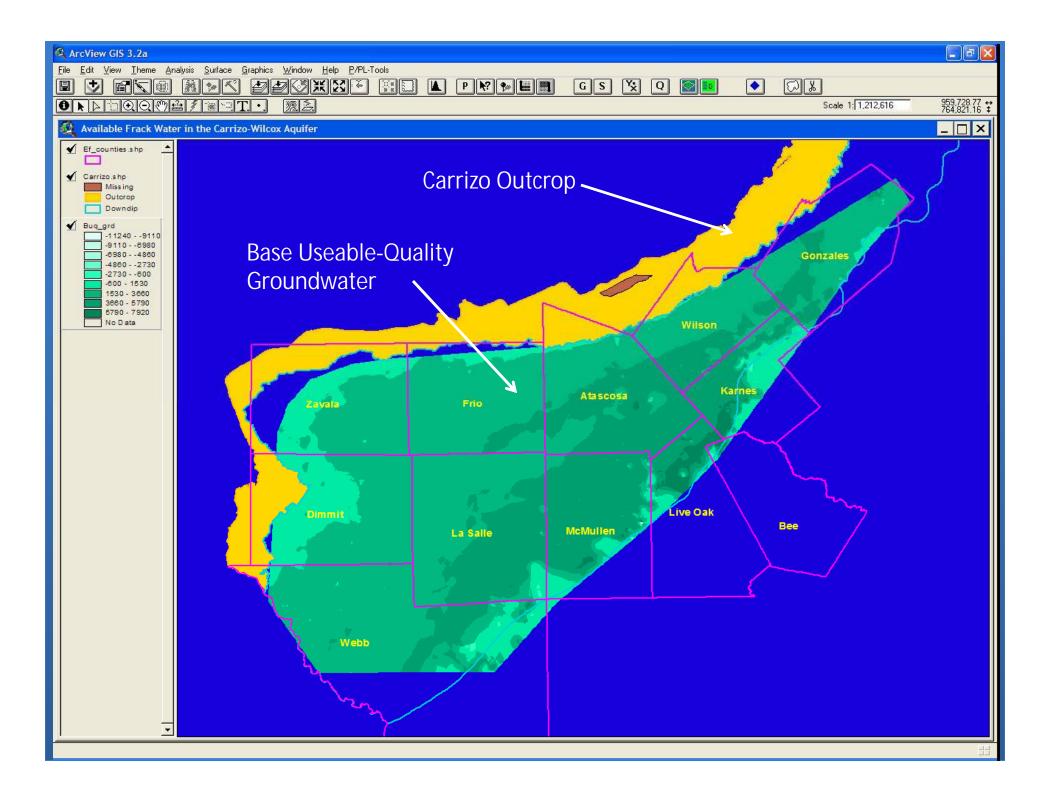


- File application form with district office
- District Director may approve, modify, or reject the proposed program
- If rejected, operator may request hearing
- Must be obtained before cementing
- When is an application needed? Surface casing set shallower than BUQW Surface casing set greater than 200' deeper than BUQW
- Rule requires approval prior to setting surface deeper than 3500'

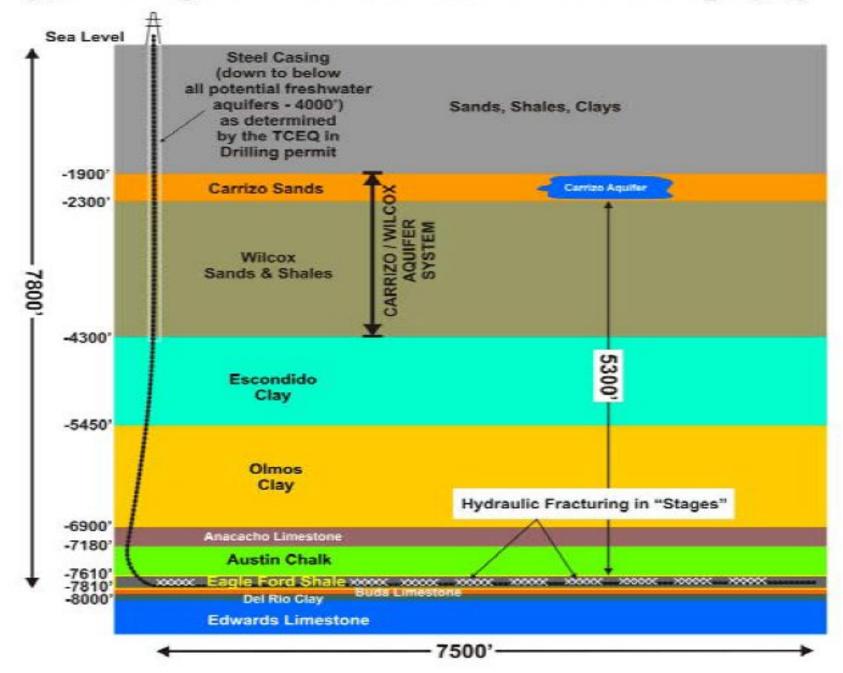


UQW

Deep UQW Carrizo Aquifer -Alternate Surface Casing



Typical Eagle Ford Horizontal Well & Stratigraphy



Wellbore Diameters



The new Rule 13 sets minimum cement sheath thickness:

- **0.75" for surface casing** string (nominal OD)
- **0.50" for subsequent casing strings** (nominal OD)

Minimums introduced for successful **cement bond** evaluation.

Requirement does not apply to re-entries and liners.

Fresh-Water Drilling Mud



 Operators must use air, fresh water or fresh water-based drilling mud until surface casing is set and cemented in a well to protect usable quality water.

Deep surface casing



- Requires RRC approval before setting surface casing to a depth greater than 3,500 feet
- GAU letter will contain statement that surface casing set deeper than 3,500' based on GAU recommendation will require DO approval.

Mechanical Integrity of Surface Casing 13(b)(1)(l)



Operators must verify the mechanical integrity of

- any string of casing protecting UQW for wells in which
- the **rotating time** for the next casing string (either the intermediate casing string or production casing string) exceeds 360 hours*
- to ensure that the drilling inside the casing did not damage casing integrity.
- Integrity can be demonstrated by casing caliper, casing inspection log, pressure test, etc.

*Rotating hours are based on the cumulative time the drill string is rotating inside the surface casing, typically recorded on daily drilling reports.

Zonal Isolation



Operators must isolate (place cement behind cases to formations permitted for injection within 1/4-mile of a proposed well:

- Across and above disposal well formations
- Above injection well formations

§13(a)(4)(D-E)

 Operators must pump sufficient cement to isolate and control annular gas migration and isolate potential flow zones and zones with corrosive formation fluids

Statewide Rule 13 New Requirements in SWR 13



§13(a)(2)(N)

RRC will establish and maintain list of potential flow zones and corrosive zones by county

List is available on website at:

http://www.rrc.state.tx.us/environmental/rule13/index.php

List to be revised as additional information becomes available



New Requirements in SWR 13 Formation Tables

- Formation lists subject to change based on new data.
- Listed formation tops for **reference only**. Formations must be isolated based on where the formations are encountered in each individual well.
- Compliance with Rule 13 will be based on formation tops listed on completion report. Formations that require isolation but are not listed on completion report will require re-filing or explanation (e.g. formation not present in well or not productive at well location).



Statewide Rule 13 New Requirements in SWR 13 Example Formation Table

Mitchell County			
Formation	Shallow Top	Deep Top	Remarks
Santa Rosa	600	600	possible lost circulation
Yates	600	1,250	overpressured, possible flows
7 Rivers	1,300	1,300	
Tubb	2,000	2,000	
San Andres	1,500	2,400	high flows, H2S, corrosive
Glorieta	2,400	2,700	
Wichita	3,300	3,300	
Clearfork	2,500	3,400	
Coleman Junction	3,100	3,600	possible lost circulation
Wolfcamp	4,800	5,300	
Strawn	3,200	5,850	
Odom	6,800	6,900	
Mississippian	6,300	7,900	
Ellenburger	7,200	8,100	

All listed formations require isolation if encountered in well

Statewide Rule 13 New Requirements in SWR 13 Example Formation Table

KLEBERG COUNTY



All listed formations require isolation if encountered in well

Formation	Shallow Top	Deep Top	Remarks
Miocene / Lagarto / Oakville	1400	6200	
	3000	3300	Kingsville Field area H2S
	2600	6200	Injection/Disposal
Catahoula Anahuac	2800	4670	
	3650	3850	Canelo Field area H2S
	2800	4670	Injection/Disposal
Catahoula Frio	2800	14050	
	8550	8750	Canelo Field area H2S
	2800	7500	Injection/Disposal
Vicksburg	6800	8700	
Jackson	11250	11250	

New Requirements in SWR 13 §13(a)(4)(D)



- Casing must be cemented* above any productive zone, potential flow zone, zones with corrosive formation fluids, or permitted injection/disposal zone (w/in ¹/₄ mile).
- 600' (md) calculated top (30% washout factor in coastal counties, 20% in all other counties); or
- 250' (md) as determined by temperature survey; or
- 100' (md) as determined by bond log; or
- At least 200' (md) calculated into the previous casing shoe

*Where necessary, cement slurries shall be designed to control annular gas migration.

New Requirements in SWR 13 Notification in Drilling Permits



- RRC query will flag with a permit restrictions any new drill permit application filed on or after 01-01-2014, as any amended new drill application that does not have a spud date prior to 01-01-2014:
- The restriction will state that "*This well must comply with the new Rule 13 requirements concerning the isolation of any potential flow zones and zones with corrosive formation fluids. See approved permit for those formations identified for the county in which you are drilling the well.*"
- The approved permit will print out with the information stored in the county table, which is available on the RRC's Internet website.

New Requirements in SWR 13 §13(a)(6)(A-B)



Consolidates and updates requirements for well control and BOPs, and distinguishes between the use of well control equipment on inland, bay and offshore wells.

- •Well control equipment must be set after conductor offshore and surface on land
- •Well control equipment must be rated to greatest anticipated pressure component
- •Diverter required on conductor if shallow gas anticipated.
- •Offshore requires double ram BOP's, and annular BOP and shear rams
- •Must comply with SWR 36 in H_2S areas.

New Requirements in SWR 13 §13(a)(6)(B)



The following components shall be installed:

- Drill pipe safety valve;
- Choke line of sufficient working pressure
- Upper Kelly cock & lower Kelly valve if utilizing Kelly rig;

All control equipment must be consistent with API Standard 53 and certified in accordance with that standard. Certification required every 5 years and made available to RRC upon request.

New Requirements in SWR 13 §13(a)(6)(B)



Testing requirements for well control equipment:

- Tested to max anticipated surface pressure, but not less than 1,500 psi, before drilling out plug on surface casing
- Upon installation
- Upon repair of any component
- Every 21 days if not otherwise required
- Records to be maintained in log signed by person responsible for the test

Secondary closure location required

More than one physical location

New Requirements in SWR 13 §13(a)(7)(A-B)



For wells undergoing hydraulic fracturing treatments, operators are required to pressure test well casings to the maximum pressure expected during the fracture treatment for 5 minutes and to notify RRC of a failed test.

- Casing and/or tubing subject to frac pressure must have an internal yield of at least 1.1 times the anticipated max pressure
- Casing and/or tubing subject to treating pressure must be pressure tested to max anticipated treating pressure
- Casing strings with pressure actuated sliding sleeves must be tested at 80% of actuation pressure

Statewide Rule 13 New Requirements in SWR 13



§13(a)(7)(C)

During hydraulic fracturing, operators must monitor the annular space between the well's casing for pressure changes and suspend hydraulic fracturing operations if the annuli monitoring indicates a potential down hole casing leak.



New Requirements in SWR 13 §13(a)(7)(D) - Minimum Separation Wells

Additional testing and monitoring requirements for "minimum separation wells" where the vertical distance between the BUQW and the top of a formation to undergo hydraulic fracturing treatment is less than 1,000 vertical feet.

- Production casing cemented 200' into next shallowest casing string
- Test to max pressure to be applied during treatment
- No disturbance of production casing for at least 8 hours and not prior to achieving 500 psi compressive strength

Statewide Rule 13 New Requirements in SWR 13



§13(a)(7)(D)- Minimum Separation Wells(cont'd)

- Run cement evaluation tool assessing radial cement integrity
- Can request exemption from District Director providing operator has:
 - Cemented and tested 5 wells in the same field
 - Obtain cement evaluation tool logs verifying cement history
 - Shown that the well will be constructed in the same manner as the other 5 wells



§13(b)(4)(A-B) - Tubing

- All flowing oil wells must be equipped with tubing
- NEW Exceptions up to 180 days may be administratively granted by the director:
 - Fee will be required when online system deployed
 - Subsequent extensions require a RRC order

Form W-2 Changes



Type or Print Only (Online filing availabe at http://www.rrc.state.tx.us) RAILROAD COMMISSION OF TEXAS Oil and Gas Division

			API No.: 42-		7. RRC District No.
OIL WELL POTENTIAL TH	EST, COMPLETION	OR RECOMP	LETION R	EPORT, AND LOG	8. RRC Lease No.
1. Field Name (as per RRC Records or Wildcat	9. Well No.				
3. Operator's Name (exactly as shown on Form	10. County				
4. Operator's Address (include street, city, state	e, zip code)				11. Purpose of filing
5a. Location (section, block and survey)	A. Producers Initial potential Retest				
5b. This well is located miles in	ı a directior	n from	, which is th	e nearest town in the county.	Reclass
6. Well Latitude/Longitude (minimum five dec	imal places required):	Latitude/Longitude typ	e:		Well record only (explain in remarks)
12a. Spud date	13. If recompletion or reclass completion, list all reservoir r Recompletion	names (completions in th	his well) and G	as ID or Oil Lease No. If multiple as ID or Oil Lease No. <mark>iple completion</mark>	B. Injection/Disposal/ Storage/Brine Mining
12b. Date of first production after rig released	Field & Reservoir	Gas ID or Oil Lease No.	Well No.	Prior Service Type (oil, gas, injection/disposal, other)	Initial completion Reclass Well record only
14. Type(s) of electric or other log(s) run					(explain in remarks)

Form W-2 Changes



INITIAL POTENTIAL TEST DATA FOR NEW COMPLETION OR RECOMPLETION (leave blank if filed for another purpose)										
	IMPORTANT: Test should be for 24 hours unless otherwise specified in field rules									
15. Date of test 16. No. of hours tested 17. Production method (flowing, gas lift, jetting, pumping - size & type of pump) 18. Choke size										
19. Production during test period: Oil (BBLS)		Oil (BBLS)	Gas (MCF)	Water (BBLS)	Gas - Oil Ratio	Flowing Tubing Pressure				
19. Froduction during test	periou:	1	I			(PSIG)				
Oil (BBLS)		Oil (BBLS)	Gas (MCF)	Water (BBLS)	Oil Gravity - API - 60°	Casing Pressure (PSIG)				
20. Calculated 24-flour Ka	20. Calculated 24-Hour Rate:									
21. Was swab used during t	21. Was swab used during this test? 22. Oil produced prior to test									
□ YES		NO		(new & recompleted wells	(new & recompleted wells):					

	DATA ON WELL COMPLETION										
23. Type of completion				24. Permit to Drill, Plug	DATE	PERMIT NO.					
				Back, or Deepen							
New well	Deepening	Side track	Other	Rule 37 Exception	DATE	CASE NO.					
Re-entry	Plug back	Recompletion	(explain in remarks)								
25. Number of producing wells	s on this lease in this fie	ld (reservoir)	26. Total number of acres in lease	Fluid Injection	DATE	PERMIT NO.					
including this well				Permit		F -					
				O&G Waste Disposal	DATE	PERMIT NO.					
27. Date of plug back,	Commenced	Ended	28. Distance to nearest well in this	Permit							
deepening, recompletion,			lease & reservoir	Other (explain)	DATE	PERMIT NO.					
or drilling operations											
29. Elevation (DF, RKB, RT,	GR, etc.)		30. Was directional survey made o	ther than inclination (Form V	V-12)?						
				YES NO							

31. Total Depth (ft.)		32. Plug Back Depth (ft.)		33. For new drill or re-entry, surface casing depth determined by:		
TVD	MD	TVD	MD			
				GAU Groundwater Protection	Depth:	
				Determination	Date:	
34. Rotation time within	n surface casing	35. Is Cementing Affidavi	t (Form W-15)]		
(hours)		attached?		SWR 13 Exception	Depth:	
		YES [] NO			



Form W-2

10	1 111 11 - 2												API N	lo.: 4	2-		
36.							CAS	NG R	ECC	RD							
Row	Type of Casing (conduct intermediate, convention tapered production, or o	al producti		Casing Size (in.) Hole Si		e (in.)	Setting Depth (ft.) Multi-Stage Tool Depth (ft.)		epth	Multi- Shoe De		Cement Cla	Cen ss Amo (sao	ount	Shurry Volume (cu. ft.)	Top of Cement	Top of Cement Determined By
1																	
2																	
3																	
4																	
37.							LIN	ER RE	co	RD							
Row	Liner Size (in	L)	Ho	ole Size (in.)	Liner To	op (ft.)	Liner Botto		Cer	nent lass		ement int (sacks	,		_	Fop of Cement	Top of Cement Determined By
1																	
2																	
38.	•		т	UBING RECO	RD				39.	•	PRC	DUCIN	G/INI	ЕСТ	ION/DISI	OSAL INT	FRVAL
Does	this well currentl O & no SWR 13 E:					_	iO ttach appro		Indi	cate toj	p and b	bottom m	easured	depth	s of complet	tion interval(s) or open hole
(Size (in.)	leepiion	- oottaint	Depth Set (ft.)		Pack	er Depth/Ty	pe	Fror	n					То		
									Fron	n					То		
									Fror	n					То		
									Fror	n					То		
									Fron	n					То		
			AC	ID, FRACTUR	E CEM	IENT	SOUEEZI	CAS	тп	RONT	BRID	GE PLI	G. RF	TAI	NER. ETC		
40. V	Vas hydraulic	41. Is y		upped with a dov		_	Production of	-			_	3. Actual					racturing fluid
	uring treatment		-	ve? YES			G) prior to					ressure (P	SIG) du	ring			ed to FracFocus
perf	ormed?	If yes, 1	provide	actuation pressure	(PSIG)	treat	tment	•			h	ydraulic f	racturing	g		registry (SV	
	YES 🗆 NO																NO
Ty	pe of Operation (in cast iron ۱			-	eze,	1	Amount and	Kind of	f Mat	erial u	sed				Depth I	nterval (ft.)	
												Fr	m			То	
												Fr	om			То	
												Fr	m			То	



Form W-2 Changes

45. FORMATION RECORD (list depths of principal geological markers and formation tops, including, but not limited to, <u>all permitted disposal/injection formations</u> within 1/4-mile of the wellbore, productive zones, potential flow zones, and corrosive formation fluid zones)									
Principal Geological Markers and Formation Tops	Depth (ft.)		Indicate if formation is a permitted disposal/injection formation, productive zone, potential flow zone, and/or a zone with corrosive formation fluids	Is formation isolated in this well? (YES/NO) (if NO, explain in remarks)					
46. Do the producing intervals of this well produ- concentration in excess of 100 ppm (SWR 36)?	46. Do the producing intervals of this well produce H2S with a 47. Is the completion being down-hole commingled (SWR 10)? concentration in excess of 100 ppm (SWR 36)? YES NO								
REMARKS:									

OPERATOR'S CERTIFICATION: I declare under penalties prescribed in Sec. 91.143, Texas Natural Resources Code, that I am authorized to make this report, that I prepared or supervised and directed this report, and that data and facts stated therein are true, correct, and complete, to the best of my knowledge.

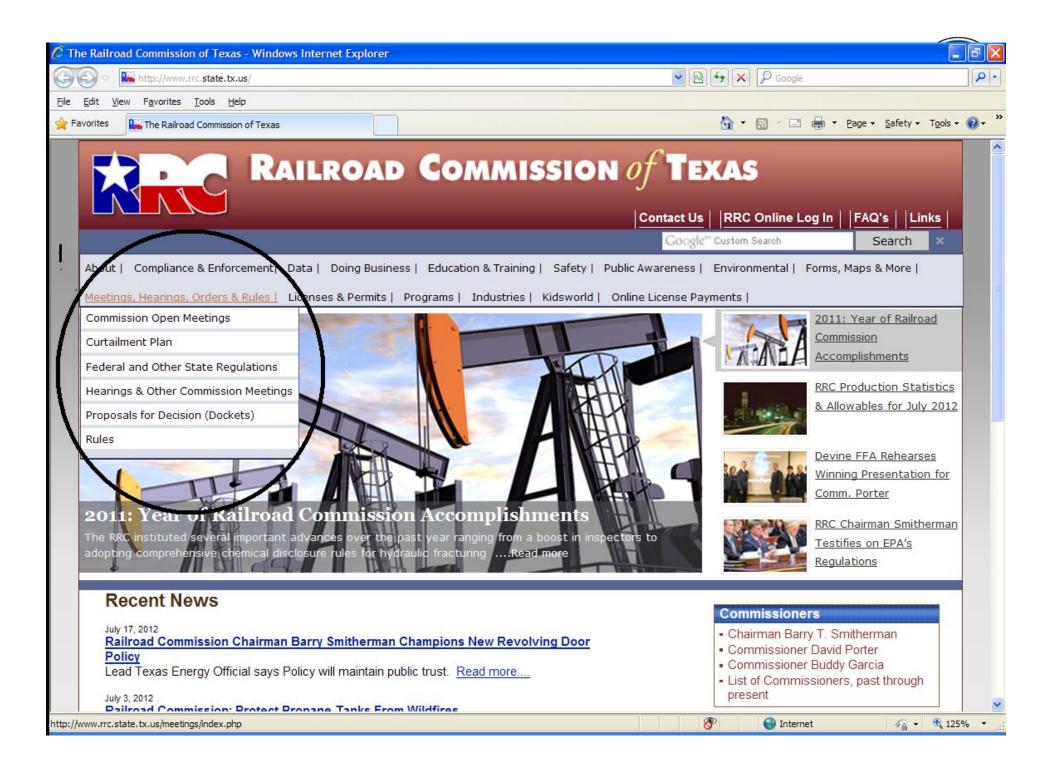
		Tel:
Signature: Operator's representative	Title	Area Code Number
Printed Name	Date	Email (include email address <u>only</u> if you affirmatively consent to its public release)

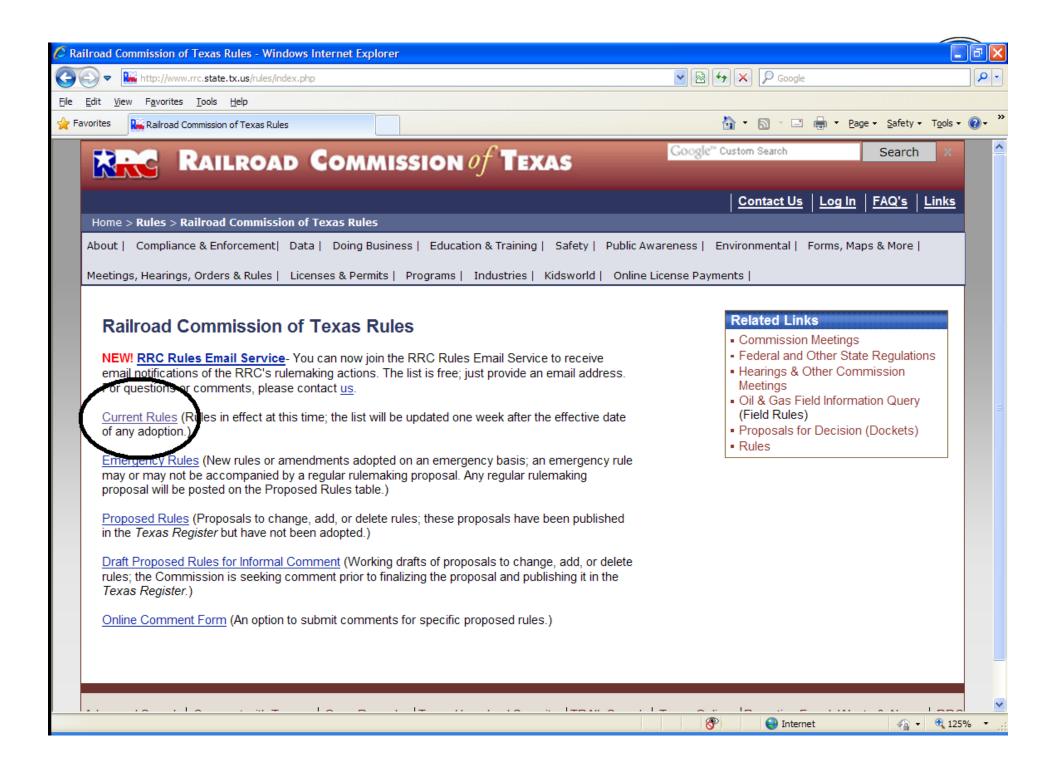
Interacting with RRC



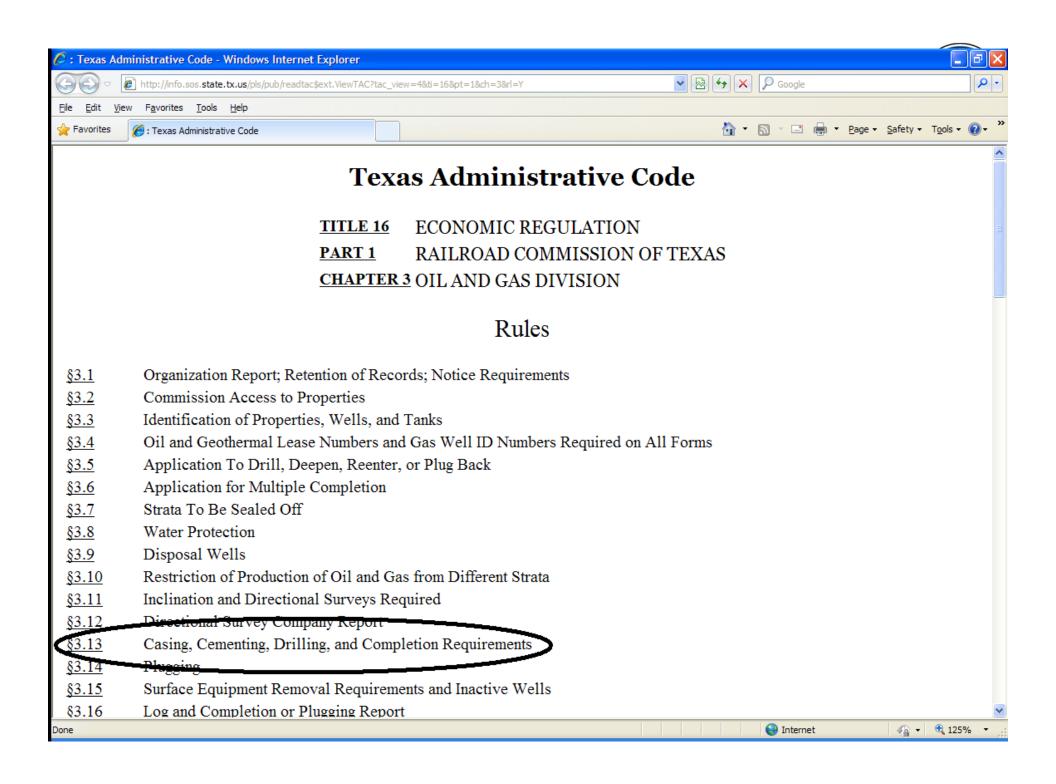
Website: www.rrc.state.tx.us

- Extensive information
 - licenses & permits, safety information, education & training
 - frequently asked questions
- Searchable databases
 - oil and gas well records, drilling permits, production reports
- Land and homeowner information
 - shale play information (*Barnett Shale, Eagle Ford Shale, Haynesville/Bossier Shale, Permian Basin Shale, etc.*)
 - pipeline eminent domain and condemnation
 - royalties





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 Were the first of Rail Service - You can now join the RRC Rules Email Service to receive gmail notifications of the RRC's rulemaking actions. The list is free; just provide an email address. For questions or comments, please contact us. Please send questions regarding the Railroad Commission's rules to the Office of General Counsel at gewehmaster@rc state.tx.us. Below is the list of Railroad Commission chapters currently in effect. Click on the chapter title to go to the list of subchapter and/or rules in that chapter. Chapter 1: Practice and Procedure Metre 7: Informal Compliant To redure (new chapter effective March 15, 2007). Chapter 3: Oil and Gas Division Chapter 4: Carbon Dioxide (CO2) (new chapter effective December 20, 2010). Chapter 7: Gas Services Division Disposition Table Mowing where the provisions of the former rules of 16 TAC Chapter 7, which became effective on July 29, 2002, are now covered in the chapter. Chapter 8: Preline Safety Regulations Chapter 9: Preline Safety Regulations Showing where the Provisions of 16 TAC Chapter 7, which became effective on July 29, 2002, are now covered in the chapter. Chapter 9: Preline Safety Regulations Chapter 9: Preline Safety Regulations Showing where the provisions of 16 TAC Chapter 7, which became effective on July 29, 2002, were formerly covered in the chapter. 		
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Newly Revised Rule 13

Updated: 07/29/13

Information regarding the new revisions to Rule 13, "Casing, Cementing, Drilling, Well Control, and Completion Requirements", which will become effective January 1, 2014.

For more information:

- Summary of Amendments and Revisions to Rule 13 11
- Rule 13 (Full text)

The weblinks below connect to geologic formation information provided as a guideline for assistance with compliance of casing cement depth during well completions. This data is categorized first by Commission District, then on a spreadsheet by county within that District. Please review the "General Information" tab for each District for additional information.

All Rule 13 Formations are listed in Excel Format

District 1	District 2	District 3	District 4	District 5	District 6 & 6E
District 7B	District 7C	District 8	District 8A	District 9	District 10

All District Complete listing - compressed zip file

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Summary



- Statewide Rule 13 designed to protect UQW and maintain well control
- Construct wells to prevent Sustained Casinghead Pressure (SCP) and maintain casing integrity
- Call the District Office for assistance



- **Q** Most new Eagle Ford wells are not required to be equipped with tubing for the first six months. Will this apply to all new wells?
 - A Starting January 1, 2014, an administrative exception to install tubing in a flowing well may be granted by the District Director (no field rule amendment required) for 180 days. If a special field rule exception already has been issued for a particular field, that field rule trumps SWR 13, and compliance is based on that field rule.
- **Q** For purposes of documentation and compliance, who is responsible for providing certification of BOP equipment--the rig owner or operator?
 - A The operator to whom the drilling/re-entry permit was issued (or the current well operator, if performing a workover) is responsible for obtaining and providing to the RRC upon request the well control equipment certification.



- **Q** Does the Groundwater Advisory Unit recommendation serve as District Office approval to set surface casing deeper than 3,500'?
 - A No; separate authorization must be obtained from the District Office to set surface casing deeper than 3,500', even if the protection depth is deeper than 3,500'. Authorization may be given on an area-wide basis (e.g. radial area, survey & abstract, etc.)
- **Q** Does an operator need to obtain an SWR 13 exception from the District Office to set surface casing below 3500 feet?
 - A No, approval to set surface casing below 3,500' is not an exception. However, the operator must notify and receive approval from the District Office prior to setting surface casing deeper than 3,500'. The District Director must approve the method for protection of UQW and maintaining well control. Exceptions will be required to set surface casing greater than 200' below the BUQW.



- **Q** If a disposal/injection permit is issued for a location within ¼ mile of a proposed new well location, is that new permitted disposal/injection zone required to be isolated in the new well?
 - A Yes; note that when SWR 9/46 are officially amended, an injection/disposal permit will not be issued until a drilling permit has been approved for the proposed well location. These wells will be identifiable on the RRC Public GIS.
- **Q** How does an operator determine if a disposal/injection well is within ¼ mile of a new well proposed location and what is required if a disposal /injection well is identified?
 - A Research RRC Public GIS site and isolate disposal/injection interval with cement in new well.



- **Q** Does the new rule change the requirements for obtaining a surface casing exception for wells producing at or above the protection depth or for single-string wells?
 - A No; a SWR 13 exception is required for all wells producing at or above the BUQW and single-string wells deeper than 1,000'.
- **Q** Can a person drill with brine drilling mud through uncased protection depths to prevent washout of shallow salt beds?
 - A The adoption preamble for SWR 13 states that potassium chloride (KCI) may be added to freshwater drilling mud prior to setting surface casing. Permission to use other brines to drill through UQW protection depths may be granted as part of SWR 13 Surface Casing exception request after showing that the drilling fluid program will provide filter cake protection through the UQW interval, or may be added to field rules through the hearing process.

Contact Information



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Any questions?