Railroad Commission of Texas

Statewide Rule 13

Presenters: Travis Baer & James Huie
Session Description

Discussion of Statewide Rule 13 regarding casing, cementing, drilling, well control and completion requirements.
Statewide Rule 13

Intent §3.13(a)(1)

• Securely anchor casing

• Isolate and seal off all useable quality water zones

• Isolate all productive zones, potential flow zones and zones with corrosive formation fluids
Statewide Rule 13

Terms of Interest §3.13(a)(2)

Zone of Critical Cement

Protection Depth

Stand under pressure

Productive Zone

Potential Flow Zone
Statewide Rule 13

§13(a)(1)
• Compliance with rule 13 required for all wells spudded on or after January 1, 2014.

§13(a)(3)
• References to wellbore diameter

§13(a)(4)
• References to casing standards, cement standards and zonal isolation requirements
Statewide Rule 13

§13(a)(6)(A-B)

- Well Control
- Blow Out Preventer Testing Requirements

§13(a)(6)(C)

- Drilling Fluid Programs
Statewide Rule 13

§13(a)(7)
- Hydraulic Fracturing Treatment Casing Tests
- Minimum Separation Wells

§13(b)(1)(A)
- Surface Casing Requirements > 3500’

§13(b)(1)(I)
- Mechanical Integrity Test of Surface Casing
Statewide Rule 13

Surface Casing Requirements §3.13(b)(2)

• Set sufficient casing to isolate all defined usable quality water strata

• Surface casing must be cemented

• Cement must be circulated to surface
Cement Compressive Strengths §3.13(b)(2)(C)

- Critical Zone cement > 1200 psi in 72 hours
- Filler cement > 250 psi in 24 hours
- API free water separation less than 2 mL water/250 mL
- RRC may require a better cement mixture
- Test slurries according to API RP 10 B
- Sample analysis
Statewide Rule 13

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
Statewide Rule 13

The RRC Online System allows authorized entities to electronically file certain forms with the Railroad Commission online or through EDI. Forms processed through this system are ones containing data that has been migrated from the Commission’s mainframe to an open system environment. Through the RRC Online System, forms can be filed online over the Internet using a web browser, or data files can be uploaded through the application.

How to Obtain a User ID:
To utilize the Online Filing system, you must have a User ID that is assigned to you by your company’s designated Security Administrator. A company or individual may designate a Security Administrator by completing the Security Administrator Designation (SAD) form and mailing it to the RRC. When the SAD form is processed, the Security Administrator will receive a User ID and a temporary initial password. The Security Administrator will be able to log into the RRC Online System using their assigned User ID and create User IDs for users within their company. They will also be able to assign certain electronic filing rights for those accounts, and perform account maintenance activities (such as resetting passwords) when needed.

If you are uncertain whether your company has a security administrator, please email the Commission at rrconline-security@rrc.state.tx.us.

1. Read the requirements for participating in online filing.
2. Print the SAD form.
3. Complete and sign the form then mail it to the RRC, following instructions on Page 2 of the form. When the form is processed, the designated security administrator will receive a User ID and temporary password by email.
4. The security administrator will log into the system and assign User IDs and filing rights.
The **SWR13EX Home** is the main landing page of the Statewide Rule 13 (SWR13EX) site, and provides the ability for you to view, sort, delete, or edit SWR13EX Applications that are in progress. From this page you can also go to an application search; view lists of submitted, approved, returned, or withdrawn applications; as well as start the creation process for a new application.

When navigating to the **SWR13EX Home**, you see a list of SWR13EX applications that are in progress as well as information about those applications, such as application status and operator information.
Statewide Rule 13

New Application – Filing and Well Info Tab

Statewide Rule 13 Exception

Filing and Well Information | Request Information | GAU Information | Exception Information | Attachments | Review

New Application

Filing Information

The operator, well and location information is prepopulated from the entered drilling permit number.

Enter a GAU Number and click Look Up GAU. Additional information from the GAU application displays. Enter a GAU Number and click Look Up GAU. Additional information from the GAU application displays.

Is this a Tubing Only Exception Request?
- Yes
- No

GAU Number: 105281

Drilling Permit Number: 784499

API Number: 39133108

Radius Distance: 200

Is this exception part of an Area-Wide Request?
- Yes
- No

Associated Application ID

Select Associated Application

Previous SWR13E Application

<table>
<thead>
<tr>
<th>Application Number</th>
<th>Lease Name</th>
<th>Well No.</th>
<th>Status</th>
<th>Submitter</th>
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<tr>
<td>101381</td>
<td>MAUDE WILLIAMS ET AL 'A'</td>
<td>D216</td>
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<td>MAUDE WILLIAMS ET AL 'A'</td>
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<td>2015-05-15</td>
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GPS Coordinates

NAD: State Plane Zone
Statewide Rule 13

New Application – GAU Info Tab

Statewide Rule 13 Exception

Filing and Well Information | Request Information | GAU Information | Exception Information | Attachments | Review

Before navigating to the next tab, click Save and Continue to update the application information.

Application Information

Application Number: 101442  Application Status: In Progress

GAU Information

GAU Areal Extent  Radius
Base of Usable Quality Water (feet, determined by GAU)  111
Recommendation Statements

The interval from the land surface to a depth of BUQ feet must be protected.

The base of usable-quality water-bearing strata is estimated to occur at a depth of BUQ feet at the site of the referenced well.

Save and Continue  Cancel
**Statewide Rule 13**

**New Application – Exception Information Tab**

Before navigating to the next tab, click Save to update the application information.

**Application Information**
- Application Number: 382
- Application Status: In Progress

**Exception Type**
- Exception Request: Select
- Tubing

**Alternate Program Request**
- Drilling Fluid Program
- Non-API Cement
- Other

**Proposed Casing and Cementing Program**
- No Casing Program Information is required

**Save and Continue**

---

<table>
<thead>
<tr>
<th>Casing Type:</th>
<th>Intermediate Casing</th>
<th>Cementing Program</th>
<th>Conventional</th>
<th>Multi-Stage</th>
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<td>Hole Size (in.)</td>
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<td>Weight (lb.)</td>
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<td>Multi-Stage Tool Depth (ft.)</td>
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<td>Number of Centralizers</td>
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<td>Centralizers Placement</td>
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<td>Lower Casing Values for Tapered String</td>
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<td>Weight (lb./ft.)</td>
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<td>Setting Crossover Depth (ft.)</td>
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# Statewide Rule 13

## New Application – Exception Information Tab (cont.)

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<th>Data Field Name</th>
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<th>Data type</th>
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<tr>
<td><strong>Cement Type</strong></td>
<td>Classification of cement slurry (e.g. Class A, Class H, 15:85 POZ, TX Lehigh, etc.)</td>
<td>Text</td>
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<tr>
<td><strong># of Sacks</strong></td>
<td>Total number of cement sacks</td>
<td>Number (up to 2 decimals)</td>
</tr>
<tr>
<td><strong>Yield</strong></td>
<td>The yield of the mixed cement in cubic ft. per sack of cement when mixed in accordance with API Spec. 10A.</td>
<td>Number (up to 2 decimals)</td>
</tr>
<tr>
<td><strong>Cement Additives</strong></td>
<td>Cement additive names and descriptions, and volume of additive in cement</td>
<td>Text (&quot;N/A&quot; or &quot;Neat&quot; is acceptable)</td>
</tr>
<tr>
<td><strong>24-hr Comp. Strength</strong></td>
<td>The measured compressive in 24-hours strength from crush test performed in accordance with API RP 10B-2.</td>
<td>Number (up to 2 decimals)</td>
</tr>
<tr>
<td><strong>72-hr Comp. Strength</strong></td>
<td>The measured compressive in 72-hours strength from crush test performed in accordance with API RP 10B-2.</td>
<td>Number (up to 2 decimals)</td>
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<tr>
<td><strong>Cement Column Height</strong></td>
<td>The calculated annular cement column height in feet from the casing shoe to the top of the cement column assuming 0% washout or gauge borehole.</td>
<td>Number (rounded to whole number)</td>
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<tr>
<td><strong>Top of Cement</strong></td>
<td>The calculated top of cement in feet below ground surface inclusive of any washout factors and excess cement volume.</td>
<td>Number (rounded to whole number)</td>
</tr>
<tr>
<td><strong>Free Water Content</strong></td>
<td>The free water content measured in mL fluid per 250 mL cement slurry in accordance with API RP 10B-2.</td>
<td>Number (up to 2 decimals)</td>
</tr>
<tr>
<td><strong>% Excess Cement</strong></td>
<td>The excess volume of cement to be pumped as a percentage of the prescribed volume of cement.</td>
<td>Number (up to 2 decimals)</td>
</tr>
</tbody>
</table>

### Slurry: Tall/Critical Cement

- **Cement Type**: Class H
- **Yield (cu. ft./sk.)**: 1.07
- **24-Hr. Comp. Strength (psi)**: 2750
- **Cement Additives**: retarder, ss-200
- **Cement Column Height (ft.)**: 7500
- **Top of Cement (ft.)**: 1.0
- **% Excess Cement**: 25
- **Free Water Content (mL water per 250mL cement)**: 550

### Slurry: Lead/Filter Cement

- **Cement Type**: Lehigh
- **Yield (cu. ft./sk.)**: 1.25
- **24-Hr. Comp. Strength (psi)**: 850
- **72-Hr. Comp. Strength (psi)**: 8000
- **Cement Column Height (ft.)**: 1100
- **Top of Cement (ft.)**: 1000
- **% Excess Cement**: 50
Statewide Rule 13

New Application – Attachments Tab

**Application Information**

- Application Number: 441
- Application Status: In Progress

**Attachments**

Attach the necessary files. Then click the Review tab to continue application process.

**Mandatory File**: GAU Recommendation Letter

**Upload Files**

- Add Attachments

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<tr>
<th>File</th>
<th>File Name</th>
<th>Size</th>
<th>Type</th>
<th>Comments</th>
<th>View File</th>
<th>Remove</th>
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</tbody>
</table>

No records found.

**Upload Files**

- GAU Recommendation Letter

**Important**: Click Choose automatically upload the selected attachments.

- Add Attachments

<table>
<thead>
<tr>
<th>File</th>
<th>File Name</th>
<th>Size</th>
<th>Type</th>
<th>Comments</th>
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<tbody>
<tr>
<td>GAU</td>
<td>Desert.jpg</td>
<td>645941</td>
<td>image.jpg</td>
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</table>

- Choose

**Jellyfish.jpg**: 757.5 KB
Statewide Rule 13

New Application – Review Tab

Statewide Rule 13 Exception

Exception Information Tab: Surface Casing: CONVENTIONAL: Slurry: Load/Filler Cement: If any one is entered, then all are required for Cement Type, # of Sacks, Yield, Cement Additives, 24 Hr Comp Strength, 72 Hr Comp Strength, Cement Height, Top of Cement, Free Water content, % Excess Cement.
  Exception Information Tab: Intermediate Casing: CONVENTIONAL: Required are Hole size, Casing OD, Grade, Weight, Shoe Setting Depth, Number of Centralizers, Centralizers Placement.
  Exception Information Tab: Intermediate Casing: CONVENTIONAL: Slurry: Tall/Critical Cement: Required are Cement Type, # of Sacks, Yield, Cement Additives, 24 Hr Comp Strength, 72 Hr Comp Strength, Cement Height, Top of Cement, Free Water content, % Excess Cement.
  Exception Information Tab: Production Casing: MULTISTAGE: Multi-Stage Tool: Slurry: If any one is entered, then all are required for Cement Type, # of Sacks, Yield, Cement Additives, 24 Hr Comp Strength, 72 Hr Comp Strength, Cement Height, Top of Cement, Free Water content, % Excess Cement.

Application Information

Application Number: 42 Application Status: In Progress

Review Application

Click Review to check the application for errors. You can finish the application process after all errors have been corrected.

Review Application

Click Review to check the application for errors. You can finish the application process after all errors have been corrected.

Review

View application as PDF

View

Terms And Conditions

I declare under penalties in Sec. 91.143, Texas Natural Resources Code, that I am authorized to file this application; that this application was prepared by me or under my supervision and direction, and that the data and facts stated therein are true, correct, and complete to be the best of my knowledge.

Finish and Pay

Cancel
Statewide Rule 13 Exception Data Sheet

STATEWIDE RULE 13 EXCEPTION APPLICATION/ALTERNATIVE REQUEST

1. REQUESTS FOR EXCEPTIONS TO STATEWIDE RULE 13 SUBMITTED AFTER THE WELL HAS BEEN DRILLED OR COMPLETED MAY RESULT IN ENFORCEMENT ACTION AGAINST THE OPERATOR.

2. For area-wide exception requests, please provide additional information which clearly defines the area to be exempted. Area-wide approvals are not allowed for short surface casing applications (only approved on a well-by-well basis). Note: District Offices are not required to grant area-wide exceptions.

3. Caution: If this well is being drilled for injection or disposal purposes, a(n) injection/disposal well permit may be denied unless surface casing is set and cemented through all zones of unstable quality grout.

4. A Minimum Separation Well, further defined in section 15(a)(x)(a), is a well in which hydraulic fracturing treatments will be conducted AND for which the vertical distance between BGSOW and the top of the formation to be fractured stimulated is less than 1,000 ft. For which the District Director has determined there to be inadequate separation between the BGSOW and the top of the formation to be fractured stimulated.

5. Review applications 1-3 (Or Orthopetal Database, Submitted Driller's Report, and Breakland Groundwater Data) at the following link to determine location(s) of water wells within 1 mile of the proposed well: [http://wellinfo.texas.gov/]

6. Refer to the Railroad Commission of Texas Public GIS map viewer to locate injection and disposal wells within 1 mile of the well(s) mentioned on the following URL: W:\Misc\GIS\atlas\Wells\index.html

7. Review W-14 or H-1a applications at [http://www.rrc.state.tx.us/cdsgis/vol2wellss/index.htm] to determine permitted injection/disposal zones for wells within 1 mile of the proposed well. Additionally, refer to Rule 13 Information Tables provided on the RRC website for information regarding saltwater, HOS, and other notable formation depths by county. [http://www.rrc.state.tx.us/cdsgis/vol2wellss/index.htm]

8. Review W-14 or H-1a applications at [http://www.rrc.state.tx.us/cdsgis/vol2wellss/index.htm] to determine permitted injection/disposal zones for wells within 1 mile of the proposed well. Additionally, refer to Rule 13 Information Tables provided on the RRC website for information regarding saltwater, HOS, and other notable formation depths by county. [http://www.rrc.state.tx.us/cdsgis/vol2wellss/index.htm]

9. Fracture cement for all and critical cement may be provided based on lab data available at the time of request. If additional lab analyses are required by the District Office, samples must be tested according to ASRM 10-2, per TDS 10-1(2),(90)

10. Notify District Office at least 2 hours prior to setting and cementing casing.

11. The alternative surface casing program authorized by this section is subject to the condition that drilling fluid used while drilling to the base of unstable quality grout have a salinity of 3,000 ppm TDS or less and be conditioned to form a filter cake sufficient to prevent infiltration of the protected water while drilling with fluid having a salinity greater than 3,000 ppm TDS below the base of unstable quality grout to the approved surface casing depth. The use of oil-based and emulsion drilling fluids are prohibited until casing is run and cemented across the base of unstable quality grout.

12. Note: The following attachments may be requested by the District Office:
   a. Proposed workover diagram or cementing proposal
   b. Lab report containing compressive strength and free water data for lead and tail slurry
   c. Any other information that may be required by the District Office.

13. Please note that a copy of the approved application form must be kept on location during all phases of drilling and/or plugging operations. Once approved, changes CANNOT be made to the Proposed Casing and Cementing Program on the original application without additional approval from the District Office.

OPERATOR CONTACT INFORMATION

Name:
Title:
Phone:
Fax:
Email Address (optional):

RRC DRY MISTAGE ACTION - FOR RRC USE ONLY:

TUBING EXC:
- approved as modified:
- approved as modified:
- approved as modified:
- approved as modified:

DRILL RIG FLOYD PROGRAM:
- approved:
- approved:
- approved:

Cement Type:
- approved:
- approved:
- approved:
- approved:

Remarks/Modifications:

Signature:
Date:

[Table for details on proposed casing and cementing program]
Statewide Rule 13

Statewide Rule 13 Exception Data Sheet

**OPERATOR CONTACT INFORMATION**

Signature: X __________________________ Name: __________________________ Title: __________________________

Date: __________________________ Phone: __________________________ Fax: __________________________

Email Address (optional): __________________________

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**RRC District Office Action—FOR RRC USE ONLY.**

<table>
<thead>
<tr>
<th>Tubing Exception:</th>
<th>Approved</th>
<th>Approved as Modified</th>
<th>Denied</th>
<th>By:</th>
<th>Date:</th>
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<tr>
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<td>Approved as Modified</td>
<td>Denied</td>
<td>By:</td>
<td>Date:</td>
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<tr>
<td>Drilling Fluid Program:</td>
<td>Approved</td>
<td>Approved as Modified</td>
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<td>By:</td>
<td>Date:</td>
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<tr>
<td>Alternate Cement Program:</td>
<td>Approved</td>
<td>Approved as Modified</td>
<td>Denied</td>
<td>By:</td>
<td>Date:</td>
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</table>

Remarks/Modifications:

---

Make sure to use version dated 2-10-2014
Statewide Rule 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.texas.gov/oil-gas/compliance-enforcement/rule-13-geologic-formation-info/

List to be revised as additional information becomes available
Statewide Rule 13

Formation Tables

• Formation lists subject to change based on new data.

• Listed formation tops for reference only.

• Compliance with Rule 13 will be based on formation tops listed on completion report.
## Statewide Rule 13

### New Requirements in SWR 13

Example Formation Table

<table>
<thead>
<tr>
<th>Mitchell County</th>
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<tbody>
<tr>
<td><strong>Formation</strong></td>
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<tr>
<td>Santa Rosa</td>
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<tr>
<td>Yates</td>
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<td>Mississippian</td>
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<tr>
<td>Ellenburger</td>
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</table>

All listed formations require isolation if encountered in well.
Statewide Rule 13

New Requirements in SWR 13
Example Formation Table

KLEBERG COUNTY

<table>
<thead>
<tr>
<th>Formation</th>
<th>Shallow Top</th>
<th>Deep Top</th>
<th>Remarks</th>
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<tbody>
<tr>
<td>Miocene / Lagarto / Oakville</td>
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</table>

All listed formations require isolation if encountered in well.
Statewide Rule 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.
Statewide Rule 13

§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
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
Common Questions

• **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.
Common Questions

• 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.
Common Questions

• **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, disposal/injection permits that have been submitted to the Commission are available on the Commission web site.

• **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 the disposal/injection interval with cement in new well in accordance with Statewide Rule 13.
Common Questions

• **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 (KCl) 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.
Common Questions

• Q  Does it count towards the 360 rotating hours when drilling is taking place in the horizontal section and the drill string is “sliding”.

  — A  No; hours are only counted when the drill string is actually rotating.
# District Offices

<table>
<thead>
<tr>
<th>District</th>
<th>City</th>
<th>Address</th>
<th>Phone</th>
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</thead>
<tbody>
<tr>
<td>1 &amp; 2</td>
<td>San Antonio</td>
<td>115 East Travis St, Suite 1610</td>
<td>(210) 227-1313</td>
</tr>
<tr>
<td></td>
<td></td>
<td>San Antonio, TX 78205</td>
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<tr>
<td>3</td>
<td>Houston</td>
<td>1706 Seamist Dr, Suite 501</td>
<td>(713) 869-5001</td>
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<td>Houston, TX 77008</td>
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<tr>
<td>4</td>
<td>Corpus Christi</td>
<td>10320 IH 37</td>
<td>(361) 242-3113</td>
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<td>Corpus Christi, TX 78410</td>
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<tr>
<td>5 &amp; 6</td>
<td>Kilgore</td>
<td>2005 North State Highway 42</td>
<td>(903) 984-3026</td>
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<tr>
<td>7B</td>
<td>Abilene</td>
<td>3444 North First St, Suite 600</td>
<td>(325) 677-3545</td>
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<td>7C</td>
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<td>622 South Oakes St, Suite J</td>
<td>(325) 657-7450</td>
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<td>8 &amp; 8A</td>
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<td>10 Desta Dr, Suite 500 E</td>
<td>(432) 684-5581</td>
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<td>5800 Kell Blvd, Suite 300</td>
<td>(940) 723-2153</td>
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<td>10</td>
<td>Pampa</td>
<td>200 West Foster, Room 300</td>
<td>(806) 665-1653</td>
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<td>Pampa, TX 79065</td>
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