

**RAILROAD COMMISSION OF TEXAS
Oil and Gas Division**

NOTICE TO OIL AND GAS WELL OPERATORS

**HORIZONTAL WELL
COMPLETIONS THAT UTILIZE
OPEN-HOLE PACKER SYSTEMS**

The Commission has received a number of completion reports for horizontal wells which propose an open-hole packer / frac port completion system as adequate vertical confinement behind pipe. This notice addresses those wells in which a shallower potentially productive horizon is exposed behind the uncemented pipe but is not completed.

Statewide Rule 13(b)(3)(A) requires that if any productive horizon is open to the wellbore above the casing shoe, the casing shall be cemented from the shoe up to a point at least 600 feet above the top of the shallowest productive horizon or at least 200 feet above the shoe of the next shallower casing string that was set and cemented in the well.

Statewide Rule 7 states, in part, that whenever hydrocarbon or geothermal resource fluids are encountered in any well drilled for oil, gas, or geothermal resources in this state, such fluid shall be confined in its original stratum until it can be produced and utilized without waste. Each such stratum shall be adequately protected from infiltrating waters.

If any potentially productive horizon is open to the annulus behind the uncemented casing/liner, other than the horizon targeted by the horizontal drainhole completion, the Commission cannot approve the completion due to noncompliance with the above-referenced portions of Statewide Rules 7 and 13.

An exception to Statewide Rule 10 (downhole commingling) will not be an appropriate resolution to this matter unless an actual completion interval exists for each horizon that is exposed behind the uncemented casing/liner.

The Commission cannot administratively grant an exception to Statewide Rules 7 and 13 based on permeability correlations showing the inability of any of these horizons to flow without stimulation. Any requests for permanent exceptions will require notice and hearing.