

In conjunction with the draft amendments to 16 Texas Administrative Code §§3.9, 3.36 and 3.46, the Commission also requests input from the public regarding certain form changes. *Please see the instructions for the draft rule amendments for information regarding submission of comments and the deadline to do so.* The Commission proposes to amend six existing forms and adopt two new forms; the Commission proposes to revise the following existing forms:

Form G-1, Gas Well Back Pressure Test, Completion or Recompletion Report, and Log;

Form H-1, Application to Inject Fluid into a Reservoir Productive of Oil or Gas;

Form H-1A, Injection Well Data for H-1 Application;

Form H-5, Disposal/Injection Well Pressure Test Report;

Form W-2, Oil Well Potential Test, Completion or Recompletion Report, and Log; and

Form W-14, Application to Dispose of Oil & Gas Waste by Injection into a Porous Formation

The Commission proposes to adopt two new forms that were carried over from the Texas Commission on Environmental Quality:

Form GW-1, Groundwater Advisory Unit Groundwater Protection Determination Request Form; and

Form GW-2, Groundwater Protection Determination.

The Commission proposes to revise **Form G-1**, Gas Well Back Pressure Test, Completion or Recompletion Report, and Log, to:

(1) delete Item Nos. 6 (“If Operator has changed within the last 60 days, name former operator”) and 13 (“Pipe line connection”); because these items are no longer applicable;

(2) move Item No. 24 from DATA ON WELL COMPLETION to the header boxes on Page 1 (Item No. 6 on new form) to keep the information regarding well location in the same section of the form;

(3) add Item 11.B Injection/Disposal/Storage/Brine Mining with Initial Completion, Reclass, and Well Record Only check boxes to differentiate the Injection/Disposal/Storage/Brine Mining completion reports from Producers completion reports;

(4) add two entry lines in Item No. 12. FIELD & RESERVOIR table (Item No. 13 on new form), add Injection/Disposal and Other columns, and add Well Latitude/Longitude and Latitude/Longitude Type to supplement well location information;

(4) bold all YES/NO questions on form;

(5) delete all section numbers;

(6) add Item No. 19 Did you preflow for 48 hours?;

(7) delete Field Data and Pressure Calculations guide to provide additional space of form;

(8) add Shut-In row and Shut-In Bottomhole Pressure box to FIELD DATA AND PRESSURE CALCULATIONS table, and remove P_w^2 , R, R^2 , P_1 , P_w/P_1 , F, K, $S=1/2$, E^{ks} , P_f and P_s , P_f^2 , $P_f^2-P_s^2$, and Angle of Slope to provide more space for other items added on the form;

(9) move WELL TESTER'S CERTIFICATION and OPERATOR'S CERTIFICATION to bottom of Page 2;

(10) add "Is the operator on this packet also the tester?", add Printed Name line, and remove RRC Representative line in the WELL TESTER'S CERTIFICATION;

(11) add Printed Name line and Email line below the OPERATOR'S CERTIFICATION;

(12) move DATA ON WELL COMPLETION to Page 1 to keep well data located in the same area of the form;

(13) remove "AND LOG" and "(Not Required on Retest)" from DATA ON WELL COMPLETION section title to clarify this section does not require log information and that the data in this section is required for a retest;

(14) add "Re-entry", "Side Track", and "Recompletion" to Item No. 17 (Item No. 26 on new form) to add additional types of completions;

(15) add TVD and MD to Item Nos. 35 through 37;

(16) amend Item No. 30 (Item No. 38 on new form) "Recommendation of T.D.W.R" to "Recommendation of G.A.U.", "Railroad Commission (Special)" to "SWR 13 Exception", and add "Date of" and "Depth" columns;

(17) delete Item No. 40 Intervals Drilled by;

(18) add Item No. 39 Rotation Time Within Surface Casing (Hours);

(19) add YES and NO checkboxes to Item No. 40 Is well multiple completion? (Item No. 31 of new form);

(20) add "(W-15)" to Item No. 35 Is Cementing Affidavit attached? (Item No. 42 on new form) to clarify that the Form W-15 is required;

(21) remove one entry line in Item No. 32. FIELD & RESERVOIR table (Item No. 41 on new form) and add Injection/Disposal and Other columns;

(22) remove Item No. 34 Name of Drilling Contractor;

(23) add API No. box at top of Page 2 to assist keeping both pages of form together;

(24) remove "(Report all Strings Set in Well)" from Item No. 36 CASING RECORD section title (Item No. 43 on new form);

(25) reorganize columns in Item No. 36 CASING RECORD table (Item No. 43 on new form) to allow for additional columns to be added to the table; add Type of Casing, Setting Depth, Multi-Stage Shoe Depth, and Top of Cement Determined by columns; and divide Type & Amount Cement (sacks) into two columns;

(26) reorganize columns in Item No. 37 LINER RECORD table (Item No. 44 and add Hole Size, Slurry Volume, Top of Cement, and Top of Cement Determined By columns;

(27) add “Does this well currently have tubing set? If NO, explain in Remarks.” and “Does this well currently have a completion interval?” to Item No. 38 TUBING RECORD (Item No. 45 on new form);

(28) add “/INJECTION/DISPOSAL” to Item No. 39 PRODUCING INTERVAL title (Item No. 46 on new form), add instruction “From and To are for Measured Depth for Horizontals.”, and add one entry line to table;

(29) add “CAST IRON BRIDGE PLUGS” to ACID, SHOT, FRACTURE, CEMENT SQUEEZE, ETC. section title; add Item No. 47 Is well equipped with an actuation valve? If yes, provide actuation procedure (PSIG), Item No. 48 Production casing test pressure (PSIG) prior to hydraulic fracturing treatment, Item No. 49 Was hydraulic fracturing treatment performed?, Item No. 50 Actual maximum pressure (PSIG) during hydraulic fracturing, and Item No. 51 Has the Hydraulic Fracturing Fluid Disclosure been reported to FracFocus Disclosure Registry (SWR29)?; add “From” and “To” in the Depth Interval column; add Cast Iron Bridge Plugs column to table; and remove table entry line;

(30) add instruction to Item No. 41 FORMATION RECORD (Item No. 52 on new form) to include permitted disposal/injection formations, productive zones, potential flow zones, and corrosive formation fluid zones within ¼ mile radius of wellbore; “TVD” and “MD” to Depth column; add column to indicate if formation is a permitted disposal/injection zone, productive zone, potential flow zone, or a zone with corrosive formation fluids; and add Item No. 53 Are the producing intervals of this well associated with a non-exempt hydrogen sulfide field (SWRv36)?; Item No. 54 Is the completion being down-hole comingled (SWR 10)?; and add an entry line at the bottom of the table;

(31) add Item No. 55 Shallowest Known Disposal/Injection Zone, Productive Zone, Potential Flow Zone, or Zone With Corrosive Formation Fluids, and add columns for Formation and Depths; and

(32) remove entry line from REMARKS field to provide more space on the form.

The Commission proposes to amend **Form H-1**, Application to Inject Fluid into a Reservoir Productive of Oil or Gas, and instructions to:

(1) revise Item 10 to reorganize the check boxes, to add checkbox to “Add Wells to Project”, and to request the Fluid Injection Project No. to be for expanded projects;

(2) remove “Add Wells” from Reason for Amendment section;

(3) request reservoir data for all projects, not just new projects;

(4) revise Item No. 25 to delete “brackish water” as a type of injection fluid due to brackish water can be either be identified as salt water or fresh water;

(5) revise Item No. 26 to require the identification of all sources of each type of injection water, including produced saltwater;

(6) add an entry line for email address in the signature area;

(7) remove numbered format from Form H-1 Instructions;

(8) add instruction to visit the website for additional Form H-1 information;

(9) remove “Assistant Director”, “Environmental Permits”, and “Capitol Station” from the address for filing original application;

(10) add instruction to refer to the RRC Fee Schedule on the Railroad Commission website for information on fees and surcharges, and add instruction that fees are non-refundable and should be made payable to Railroad Commission of Texas;

(11) add “For an exception request to Statewide Rule 46(g)(2)(A) and/or (i)(1) file an amended Form H-1 and H-1A, a complete electric log and a letter of explanation”;

(12) add “new permit, amending injection interval or request for an exception Statewide Rule 46(g)(3) and/or (j)(5)(B)”;

add “If for disposal, the GAU letter must identify the base of underground sources of drinking water”;

add instruction to go the Groundwater Advisory Unit Home page for more information; add clarifying language “this is not required for an exception to Statewide Rule 46(g)(2)(A) and/or (j)(i);

(13) move Form H-7, Fresh Water Data Form, up in the instructions; add instruction that the Form H-7 is not required if the fresh water is purchase from a commercial supplier, public entity, or from another operator; and add “The fresh water questionnaire must be submitted with each application that includes fresh water”;

(14) remove information specific to the one-quarter (1/4) mile radius map for an amendment to add wells to a previous authority; add “For horizontal wells the one-quarter mile will be the area within both the vertical and horizontal segment of the well”; and add an instruction that the one-quarter (1/4) mile map is not required for an exception to Statewide Rule 46(g)(2)(A) and/or (i)(1);

(15) add instruction that all wells within a one-quarter (1/4) mile must be included in the table of wells; add “well identification”; “total depth” and “the plugging dates for of those wells are plugged”;

(16) add instruction to “identify any wells that are not adequately cased and/or cemented and unplugged, improperly plugged, orphaned, that lack cement behind the casing through the proposed injection interval and penetrate the proposed injection interval; add “NOTE: If the application is for an amendment, a table of wells within a one-quarter (1/4) mile radius is required only if the current permit was issued before April 1, 1982, or if the amendment is for a shallower injection depth”;

(17) add instructions for a commercial disposal well application;

(18) add instructions stating notification of a new application must be sent 30 days before the date the application is submitted; a certified mail return receipt or similar document must be submitted to the Commission; the notification must include a both front and back of the application, a scaled map with the location of the proposed well, and roads and highways;

(19) add instructions for notifying the city clerk(s) or other appropriate city official of any city where the well(s) is located within municipal boundaries, add additional notification requirements for commercial disposal wells; add requirement to include relationship of person(s) being notified to the applicant, mailing or physical address of persons who are affected, and the date notification was mailed or delivered; add instruction that signed statement is not required for an exception to Statewide Rule 46(g)(2)(A) and/or (i)(1);

(20) add instruction that states affidavit of publication must be signed by the newspaper publisher, add affidavit must specifically state that the notice of publication has been published once by the applicant, no more than 30 days before submission to the Commission; and

(21) add condition that the protest shall contain a copy of the application and/or publication, if available, or the operator name, lease name, field name, well number and county.

The Commission proposes to amend Form **H1-A**, Injection Well Data, to

- (1) revise Item No. 11 to include “Plug Back Depth”;
- (2) add NAD27/NAD83 options to Item No. 14.b for latitude and longitude;
- (3) add “DV Depth” to “Setting Depth” column;
- (4) add “# Sacks of Cement at DV” to “# Sacks of Cement” column;
- (5) revise Item No. 25 to require a wellbore sketch for a multiple completion;
- (6) add Item No. 26. Directional or Horizontal Wellbore? (Attach wellbore sketch for yes)”;
- (7) delete Item No. 29, relating to estimated average daily injection volume for each fluid type;
- (8) add Item No. 30 Maximum Surface Injection Pressure (psig) for liquid and gas;
- (9) revise instructions to require that the applicant provide the proposed field name and field number if the project is a workover or unitization, and to require the proposed well numbers for wells to be unitized.

The Commission proposes to revise **Form H-5**, Gas Well Back Pressure Test, Completion or Recompletion Report, and Log, to:

- (1) delete “FOR RRC USE ONLY” in UIC CONTROL NO. box in the right corner of the form to allow the operator to provide the UIC Control No. and Type;
- (2) move RRC OPERATOR NO. box to be grouped with the OPERATORS NAME and ADDRESS; and move boxes relating to the location of the well to the top right of the form;
- (3) replace Item No. 16.a PACKER MAKE AND MODEL and Item No. 16.b. DEPTH SET with Item No. 16.a PACKER DEPTH and Item No. 16. PLUG DEPTH (CIBP, TEMPORARY, CEMENT);
- (4) add a check box to indicate if the well is Shut-In to Item No. 25;
- (5) add email address to Certification section of the form to request additional contact information for the filer;
- (6) amend NOTICE on the Form H-5 Instructions to state that the Form H-5 cannot be used for underground storage wells regulated under Statewide Rule 96.
- (7) amend Item No. 1 WHO TO NOTIFY to authorize testing the commence before the end of the 48-hour period if the District Office authorizes a shorter notice;
- (8) amend Item No. 4(a) to clarify the pressure-recording chart must be filed with this form for all tests;
- (9) amend Item No. 4(b) to change the casing test pressure requirement to be within 20-70%;
- (10) amend Item No. 4(c) to require the casing test pressure to be at least equal to the maximum authorized injection pressure or 500 psig, and to include the following instruction “For wells that are permitted that are permitted for injection through casing the test must equal the maximum permitted injection pressure of 220 psig, whichever is greater”;

(11) amend Item No. 4(d) to require a test to be conducted for at least 30 minutes when the test medium is liquid or for 60 minutes when the test medium is air or gas; and to require “The testing fluid be liquid, and contain no additives that will reduce the effectiveness of the test, for wells that inject liquid unless the director authorizes the use of a difference test fluid for good cause.”

(12) add to Item No. 4(e) to provide what may cause the rejection of a test; and

(13) add Item No. 4(g) to instruct that when a well fails a test, the district office must be notified and well must be shut-in until well has been remediated, a mechanical integrity test has been passed, and the director approves of the results of the test.

The Commission proposes to revise **Form W-2**, Oil Well Potential Test, Completion or Recompletion Report, and Log, to

(1) move Item No. 31 from DATA ON WELL COMPLETION to the header boxes on Page 1 (Item No. 6 on new form);

(2) add Item 11.B Injection/Disposal/Storage/Brine Mining with Initial Completion, Reclass, and Well Record Only check boxes;

(3) add two entry lines in Item No. 12. FIELD & RESERVOIR table (Item No. 13 on new form), add Injection/Disposal and Other columns, and add Well Latitude/Longitude and Latitude/Longitude Type;

(4) add Item No. 15 Any condensate on hand at time of workover or recompletion?;

(5) bold all Yes/No questions on form;

(6) remove all section numbers on form;

(7) add Item No. 24 Shut-in Bottomhole Pressure (Optional);

(8) remove Item No. 23 Injection Gas—Oil Ratio;

(9) remove field for Remarks in POTENTIAL TEST DATA section;

(10) remove instructions for filing Form W-2;

(11) move WELL TESTER’S CERTIFICATION and OPERATOR’S CERTIFICATION to bottom of Page 2;

(12) add “Is the operator on this packet also the tester”, add Printed Name line, and remove RRC Representative line in the WELL TESTER’S CERTIFICATION;

(13) add Printed Name line and Email line below the OPERATOR’S CERTIFICATION;

(14) move DATA ON WELL COMPLETION to Page 1;

(15) remove “AND LOG” and “(Not Required on Retest)” from DATA ON WELL COMPLETION section title;

(16) add “Re-entry”, “Side Track”, and “Recompletion” to Item No. 24 (Item No. 25 on new form);

(17) add TVD and MD to Item Nos. 34 through 36;

(18) amend Item No. 37. “Recommendation of T.D.W.R” to “Recommendation of G.A.U.”, “Railroad Commission (Special)” to “SWR 13 Exception”, and add “Date of” and “Depth” columns;

(19) delete Item No. 40 Intervals Drilled by;

(20) add Item No. 38 Rotation Time Within Surface Casing (Hours);

(21) add YES and NO checkboxes to Item No. 38 Is well multiple completion? (Item No. 39 of new form);

(22) remove one entry line in Item No. 40. FIELD & RESERVOIR table (Item No. 39 on new form) and add Injection/Disposal and Other columns;

(23) add “(W-15)” to Item No. 42 Is Cementing Affidavit attached? (Item No. 41 on new form);

(24) remove Item No. 41 Name of Drilling Contractor;

(25) add API No. box at top of Page 2 to assist keeping both pages of form together;

(26) remove “(Report all Strings Set in Well)” from Item No. 43 CASING RECORD section title (Item No. 42 on new form);

(27) reorganize columns in Item No. 43 CASING RECORD table (Item No. 42 on new form); add Type of Casing, Setting Depth, Multi-Stage Shoe Depth, and Top of Cement Determined by columns; and divide Type & Amount Cement (sacks) into two columns;

(28) reorganize columns in Item No. 44 LINER RECORD table (Item No. 43 on new form); and add Hole Size, Slurry Volume, Top of Cement, and Top of Cement Determined By columns;

(29) add “Does this well currently have tubing set? If NO, explain in Remarks.” and Does this well currently have a completion interval?” to Item No. 45 TUBING RECORD (Item No. 44 on new form);

(30) add “/INJECTION/DISPOSAL” to Item No. 46 PRODUCING INTERVAL title (Item No. 45 on new form) add instruction “From and To are for Measured Depth for Horizontals.”, and add one entry line to table;

(31) add “CAST IRON BRIDGE PLUGS” to ACID, SHOT, FRACTURE, CEMENT SQUEEZE, ETC. section title; add Item No. 46 Is well equipped with an actuation valve? If yes, provide actuation procedure (PSIG), Item No. 47 Production casing test pressure (PSIG) prior to hydraulic fracturing treatment, Item No. 48 Was hydraulic fracturing treatment performed?, Item No. 49 Actual maximum pressure (PSIG) during hydraulic fracturing, and Item No. 50 Has the Hydraulic Fracturing Fluid Disclosure been reported to FracFocus Disclosure Registry (SWR29)?; add “From” and “To” in the Depth Interval column; add Cast Iron Bridge Plugs column to table; and remove table entry line;

(32) add instruction to Item No. 48 FORMATION RECORD (Item No. 51 on new form) for record to include permitted disposal/injection formations, productive zones, potential flow zones, and corrosive formation fluid zones within ¼ mile radius of wellbore; “TVD” and “MD” to Depth column; add column to indicate if formation is a permitted disposal/injection zone, productive zone, potential flow zone, or a zone with corrosive formation fluids; and add Item No. 52 Are the producing intervals of this well associated with a non-exempt hydrogen sulfide field (SWRv36)? and Item No. 53 Is the completion being down-hole comingled (SWR 10)?;

(33) add Item No. 54 Shallowest Known Disposal/Injection Zone, Productive Zone, Potential Flow Zone, or Zone With Corrosive Formation Fluids, and add columns for Formation and Depths; and

(34) remove entry line from REMARKS field.

The Commission proposes to revise **Form W-14**, Application to Dispose Oil and Gas Waste by Injection into a Porous Formation Not Productive of Oil and Gas, to:

(1) add options to Item No. 13 NAD27 and NAD83 for the latitude and longitude;

(2) add “Plugback Depth” to Item No. 19;

(3) add “Attach wellbore sketch for yes” to Item No. 27;

(4) add Item No. 28, “Direction/horizontal wellbore?” and “Attach wellbore sketch for yes”;

(5) add clarifying language to Item No. 35 clarify that we need any oil and gas productive zone within, above, or below proposed disposal interval within two miles (Item No. 36 on new form);

(6) add the maximum daily injection volume for gas to Item No. 36 the daily injection volume line for liquid (Item No. 37 on new form);

(7) delete Item No. 37 and 39, because the estimated average daily injection volume and estimated average surface injection pressure are no longer used when evaluating application;

(8) add Item No. 38 maximum surface injection pressure for liquid and gas;

(9) remove “Brackish Water” from type of injection fluid due to brackish water may be either identified as salt water or fresh water;

(10) add email address option in the signature line area;

(11) remove numbered format from FORM W-14 Instructions;

(12) add instruction to visit the website for additional Form W-14 information;

(13) remove Environmental Permits form the address for filing original application;

(14) add instruction to refer to the RRC Fee Schedule on the Railroad Commission website for information on fees and surcharges, and add instruction that fees are non-refundable and should be made payable to Railroad Commission of Texas;

(15) add instruction “For an exception request to Statewide Rule 9(6)(i) file an amended Form W-14, complete electric log and letter of explanation”;

(16) add instruction for new permit applications, amending injection interval, or request for an exception to Statewide Rule 9(6)(i), need to attach a complete electric log and to attach any other information that may facilitate the review of the application, such as a cement bond log, a cementing record, or a well bore sketch.

(17) replace references to Texas Commission of Environmental Quality (TCEQ) with Groundwater Advisory Unit (GAU); clarify that the formations to be used for disposal are not underground sources of drinking water; amend instruction for one copy of the Form W-14 must be filed to obtain a GAU letter instead of two copies; amend instruction for a scaled map showing well location and surrounding survey lines; add requirement for a copy of the current Groundwater Protection Letter for the well or completed 0051P Transition Form and a copy of a representative electronic log that includes the log header and interval from land surface through injection inter to GAU MC 151, P.O. Box 12967, Austin, Texas 78701; and add instruction a

new GAU letter is required for an amendment for a change in the disposal interval and that a new GAU letter is not required for an exception to Statewide Rule 9(6)(i);

(18) move one-half (1/2) mile map requirements below one-quarter (1/4) mile map requirements; add wells with unexpired drilling permit to map; add instruction that one-half (1/2) mile map is not required for an exception of Statewide Rule 9(6)(i). add map requirement for a map of all wells within one-quarter (1/4) mile radius of the proposed disposal well; remove requirement to show each Commission-designated operator of each well within one-half (1/2) mile of proposed disposal well; remove requirement for the map show the ownership of the proposed disposal well tract and the surface tracts that adjoin the proposed disposal well tract;

(19) amend table of all wells requirement to include all wells within one-quarter (1/4) mile radius not just wells that penetrate the disposal interval; add “orphaned” wells and well that lack cement behind the casing through the disposal interval to wells that must be identified on table; amend variance reference to Rule 9(g)(2); and add instruction that the one-quarter (1/4) mile radius table is not required for an exception to Statewide Rule 9(6)(i);

(20) remove information specific to the one-quarter (1/4) mile radius map for an amendment to add wells to a previous authority; add “For horizontal wells the one-quarter mile will be the area within both the vertical and horizontal segment of the well”; and add an instruction that the one-quarter (1/4) mile map is not required for an exception to Statewide Rule 46(g)(2)(A) and/or (i)(1);

(21) add instruction that all wells within a one-quarter (1/4) mile must be included in the table of wells; add “well identification”; “total depth” and “the plugging dates for of those wells are plugged”;

(22) add instruction to “identify any wells that are not adequately cased and/or cemented and unplugged, improperly plugged, orphaned, that lack cement behind the casing through the proposed injection interval and penetrate the proposed injection interval; add “NOTE: If the application is for an amendment, a table of wells within a one-quarter (1/4) mile radius is required only if the current permit was issued before April 1, 1982, or if the amendment is for a shallower injection depth”;

(23) add instructions for a commercial disposal well application;

(24) add instructions stating notification of a new application must be sent 30 days before the date the application is submitted; a certified mail return receipt or similar document must be submitted to the Commission; the notification must include a both front and back of the application, a scaled map with the location of the proposed well, and roads and highways;

(25) add instructions for notifying the city clerk(s) or other appropriate city official of any city where the well(s) is located within municipal boundaries, add additional notification requirements for commercial disposal wells; add requirement to include relationship of person(s) being notified to the applicant, mailing or physical address of persons who are affected, and the date notification was mailed or delivered; add instruction that signed statement is not required for an exception to Statewide Rule 9(6)(i) and/or (i)(1);

(26) add instruction that states affidavit of publication must be signed by the newspaper publisher, add affidavit must specifically state that the notice of publication has been published once by the applicant, no more than 30 days before submission to the Commission; and

(27) add condition that the protest shall contain a copy of the application and/or publication, if available, or the operator name, lease name, field name, well number and county.

The Commission proposes to adopt two new forms: **Form-GW-1**, Depth of Usable Quality Groundwater to be Protected – SC Letter request form; and **Form GW-2**, Groundwater Detection

Determination. The Commission proposes to amend existing Form 0051P, Depth of Usable-Quality Groundwater to be Protested, SC Letter Request Form, and rename it as Form GW-1, Groundwater Protection Determination Request form, and remove instructions regarding the RRC Online Payment System. The Commission also proposes to rename the Groundwater Protection Determination, Form GW-2, Groundwater Protection Determination, and to remove “SC-“ from the GAU File No.