

FREQUENTLY ASKED QUESTIONS

Environmental Protection Performance Standards at Oil and Gas Well Sites

Well record and completion report
(§ 78a.122)

The purpose of this Frequently Asked Questions (FAQ) document is to highlight changes in and address questions about the new regulations. This FAQ should not be used in lieu of reference to the 2012 Oil and Gas Act, 25 Pa.Code Chapter 78a and other applicable laws and regulations. The answers outlined in this FAQ are intended to supplement existing requirements. Nothing in this document shall affect statutory or regulatory requirements.

This document is not an adjudication or a regulation. There is no intent on the part of the Department to give this document that weight or deference. The Department may supplement or amend this document at any time as necessary without notice.

- 1) Does recycled produced water generated on a well site and used on the same well site need to be accounted for in the monthly waste reporting requirement in 78a.122?

Yes. (posted 09/23/16)

- 2) When will the new production and waste report forms be available? When will the new Completion Report forms be available?

There is no paper form for production and waste reporting. Production and waste reporting has been electronic for several years.

The completion report form will be available in eLibrary when the final rulemaking is published in the *Pennsylvania Bulletin*. (posted 09/23/16)

- 3) Regarding Well Records and the start of the "30-Day Clock". Does drilling mean - well has reached final total depth (TD) or when final casing is cemented in the hole. There could be a day or two of lag between finish of drilling and "complete construction" of the well.

The 30 day clock for submitting a well record begins when the drilling reaches TD.

[FAQ: Clarification Regarding Well Record Submission Requirements](#)(posted 09/23/16)

- 4) What needs to be on the "Certification of Area of Review" when it is submitted with the Completion Report? Is there a DEP form for this?

The certification of implementation of the area of review monitoring plan is contained in the signature block of the well completion report form. (posted 09/23/16)

- 5) Will we need to report each individual source of recycled water on the Completion Report?

No, the Completion Report requires just the total volume of recycled water. (posted 09/23/16, revised 02/12/21)

6) What constitutes the “well is capable of production”?

A well is “capable of production” after “completion of the well.” Section 3203 of the 2012 Oil and Gas Act (relating to definitions) defines “completion of a well” as “[t]he date after treatment, if any, that the well is properly equipped for production of oil or gas, or, if the well is dry, the date that the well is abandoned.” The Department considers a well to be “properly equipped for production of oil or gas” under the following circumstances:

For wells not intended to have the producing interval cased or stimulated prior to production (that is, natural wells), the well is properly equipped for production when the well has been drilled to total depth.

For wells intended to have the producing interval cased, but not stimulated, prior to production, the well is properly equipped for production when the last perforation is placed.

For wells intended to be stimulated prior to production, the well is properly equipped for production upon commencement of flow back. (posted 09/23/16)

7) A Completion Report is required 30 days after drilling out hydraulically fracturing plugs? Is this a fair synopsis?

Yes. (posted 09/23/16)

8) 78a.122(b). Will listing the well development impoundment take the place of the initial withdrawal point of the water? Or are both scenarios reported?

A) Source → B) Impoundment → C) Frac

With the current form, both scenarios must be reported. (posted 09/23/16)