

**Regulatory Citation(s):**

**78.83. Surface and coal protective casing and cementing procedures.**

(d) The operator shall permanently cement the surface casing by placing the cement in the casing and displacing it into the annular space between the wall of the hole and the outside of the casing.

**Question:**

May an operator use stage cementing to permanently cement surface or coal protective casing?

**Response:**

Stage cementing using a DV Tool or similar apparatus is appropriate in certain scenarios and does satisfy the definition of permanent cementing provided no packers or other devices are used between individual cement stages. In other words, to meet the definition, the cement column in the annular space must be continuous and circulated to the surface in the annular space through displacement. It is expected that stage cementing will be more commonplace for deeper casing strings, i.e., intermediate strings, that intercept one or more weaker formations incapable of supporting the hydrostatic pressure associated with a long column of cement slurry without breaking down.