

Regulatory Citation(s):

78.83. Surface and coal protective casing and cementing procedures.

(j) If it is anticipated that cement used to permanently cement the surface casing cannot be circulated to the surface a cement basket may be installed immediately above the depth of the anticipated lost circulation zone. The casing shall be permanently cemented by the displacement method. Additional cement may be added above the cement basket, if necessary, by pumping through a pour string from the surface to fill the annular space. Filling the annular space by this method does not constitute permanently cementing the surface or coal protective casing under Section 78.83b (relating to casing and cementing-lost circulation).

Question:

In instances where no surface returns are observed, does filling the annulus of the surface or coal protective casing using a pour string render that casing string permanently cemented?

Response:

The regulatory citation above clearly indicates that filling the annular space of a surface or coal protective string using a pour string does not render the casing string permanently cemented in circumstances where no returns were observed during the primary cementing operation: Filling the annular space by this method does not constitute permanently cementing the surface or coal protective casing under Section 78.83b (relating to casing and cementing-lost circulation).