

Regulatory Citation(s):

78.85. Cementing standards.

(b) After the casing cement is placed behind surface casing, the operator shall permit the cement to set to a minimum designed compressive strength of 350 pounds per square inch (psi) at the casing seat. The cement placed at the bottom 300 feet of the surface casing must constitute a zone of critical cement and achieve a 72-hour compressive strength of 1,200 psi and the free water separation may be no more than 6 milliliters per 250 milliliters of cement. If the surface casing is less than 300 feet, the entire cemented string constitutes a zone of critical cement.

Question:

Regulations are finalized while the operator is finishing drilling the surface hole with a top hole rig and a service company will be cementing the surface casing soon. Materials have been ordered and the service company contract is in place. New cement standards require a zone of critical cement which may require new materials, cement vendor testing, etc. Although it is relatively easy in many circumstances to quickly have the service company change/reformulate the cement blend, depending on timing and how soon the surface casing is to be cemented, there may be situations where it might not be practical to comply with the new regulations.

Response:

Reasonable accommodation to allow cement as prescribed under the old regulations is permissible. However, the new regulations requiring cement returns to the surface or notice to the Department in the event that surface returns are not achieved are still required.