

**Regulatory Citation(s):**

**78.92. Wells in coal areas – surface or coal protective casing is cemented.**

(a) In a well underlain by a workable coal seam, where the surface casing or coal protective casing is cemented and the production casing is not cemented or the production casing is not present, the owner or operator shall plug the well as follows:

- (1) The well shall be filled with non-porous material from the total depth or attainable bottom of the well, to a point 50 feet below the lowest stratum bearing or having borne oil, gas, or water. At this point there shall be placed a plug of cement, which shall extend for at least 50 feet below this formation to a point 50 feet above this formation.

**78.93. Wells in coal areas – surface or coal protective casing anchored with a packer or cement.**

(a) In a well where the surface casing or coal protective casing and production casing are anchored with a packer or cement, the owner or operator shall plug the well as follows:

- (1) The well shall be filled with non-porous material from the total depth or attainable bottom of the well, to a point 50 feet below the lowest stratum bearing or having borne oil, gas, or water. At this point there shall be placed a plug of cement, which shall extend for at least 50 feet below this formation to a point 50 feet above this formation.

**78.94. Wells in noncoal areas – surface casing is not cemented or not present.**

(a) The owner or operator shall plug a noncoal well, where the surface casing and production casing are not cemented, or is not present as follows:

- (1) The well shall be filled with non-porous material from the total depth or attainable bottom of the well, to a point 50 feet below the lowest stratum bearing or having borne oil, gas, or water. At this point there shall be placed a plug of cement, which shall extend for at least 50 feet below this formation to a point 50 feet above this formation.

**78.95. Wells in noncoal areas – surface casing is cemented.**

(a) The owner or operator shall plug a well, where the surface casing is cemented and the production casing is not cemented or not present, as follows:

- (1) The well shall be filled with non-porous material from the total depth or attainable bottom of the well, to a point 50 feet below the lowest stratum bearing or having borne oil, gas, or water. At this point there shall be placed a plug of cement, which shall extend for at least 50 feet below this formation to a point 50 feet above this formation.

**Question:**

When currently plugging wells under an existing contract, must the plugging contractor place the plug in a manner consistent with the prior regulations, or move the location of the cement plug to across the producing formation(s) as prescribed in the new regulations? Altering plugging techniques in mid-contract would be inconsistent with the technical specifications established under the executed contract.

**Response:**

Plugging revisions only apply to new contracts, not existing contracts. This also applies to other operators plugging.