8000-PM-OOGM0024 4/2012

pennsylvania
DEPARTMENT OF ENVIRONMENTAL PROTECTION

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
OFFICE OF OIL AND GAS MANAGEMENT

DEP USE ONLY
Application Tracking # 1285044

Proposed Alternate Method or Material for Casing, Plugging, Venting or Equipping a Well

Well Operator	DEP ID#	Well Permit or Registration Number	
Chevron Appalachia, LLC	279986	37-051-24712	
Address		**Well Farm Name**	
700 Cherrington Parkway		Snapp Teslovich	
City	**State** / **Zip Code**	**Well #**	**Serial #**
Coraopolis	PA / 15108	M09H	37-051-0949
Phone	**Fax**	**County**	**Municipality**
412-865-3140	412-854-2403	Fayette	Luzerne

A proposed alternate method is subject to provisions in §3221 of the 2012 Oil and Gas Act, 58 Pa. C.S. §3221 Section 13 of the Coal and Gas Resource Coordination Act, 58 P.S. §513 and 25 PA Code §§78.75-78.75a (relating to Alternate Methods.) ***Attach proof of notification of coal operator(s).***

Describe in reasonable detail using a written description and / or diagram:

1. **the proposed alternate method or materials, and**
2. **the manner in which the alternative will satisfy the goals of the laws and regulations.**

See Attachment A

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Optional: Approval by Coal Owner or Operator	
Signature	**Date**
Print or Type Signer's Name and Title	

Signature of Applicant / Well Operator	
Signature	**Date**
	8/19/19
Print or Type Signer's Name and Title	
Branden Weimer, Senior Permitting Advisor	

If optional approval is signed by coal owner or operator, the 15-day objection period may be waived.

DEP USE ONLY		
Approved by (DEP Manager)	**Conditions**	**Date**
	☐ YES, See Attached ☒ NO	10/30/19

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Proposed Alternate Method or Material for Casing, Plugging, Venting or Equipping a Well

Attachment A

Snapp Teslovich M09H
Well Permit Number: 37-051-24712

1. Problem:
According to 25 PA Code Section 78a.83(h) the maximum allowable hole drilled below the bottom of a mined out coal seam is 50 feet. In this area, 50 feet below the open mine is inadequate to collect the excess cavings encountered and run our coal mine protection string a minimum of 30 feet below the bottom of the mine (a DEP requirement). No gas zones are known to exist within 100 feet below the mine.

Recommendation:
Drill no more than 100 feet below the bottom of the mine; set the coal protection casing at least 30 feet (and perhaps more than 50 feet if the hole conditions dictate) below the bottom of the coal mine and cement to surface according to 25 PA Code Section 78.83(h)

2. Problem:
According to PA 25 Code Section 78a.85(c) After any casing cement is placed and cementing operations are complete, the casing may not be disturbed for a minimum of 8 hours by doing any of the following:
(1) Releasing pressure on the cement head within 4 hours of cementing if casing equipment check valves did not hold or casing equipment was not equipped with check valves. After 4 hours, the pressure may be released at a continuous, gradual rate over the next 4 hours provided the floats are secure.
(2) Nippling up on or in conjunction to the casing.
(3) Slacking off by the rig supporting the casing in the cement sheath.
(4) Running drill pipe or other mechanical devices into or out of the wellbore with the exception of a wireline used to determine the top of cement.

Recommendation:
The operator can perform BOP testing while waiting on the intermediate casing cement to cure for 8hrs. The following arguments are in support of the alternate method:

- The Well is a Marcellus well
- The casing equipment will be equipped with check valve(s). This alternate method applies only if the check valve(s) hold.
- The BOP would already be installed on the wellhead- Therefore there is no nipple up on or in conjunction to the casing
- The intermediate casing uses a hanger that lands in the wellhead- Therefore there is no slacking off by the rig supporting the casing in the cement sheath
- For 8 hrs. No drill pipe or other mechanical devices will be run into or out of the wellbore with the exception of wireline used to determine the top of the cement if need be.
- For 8 hrs. No pressure will be applied on the casing. A test plug will be landed inside the wellhead and casing valves open below the test plug during the entire test time.

3 Problem:

According to Chapter 78a. Unconventional Wells Section 78a.83(c) "The operator shall drill to approximately 50 feet below the deepest fresh groundwater or at least 50 feet into consolidated rock, whichever is deeper, and immediately set and permanently cement a string of surface casing to that depth." In this area, there is not adequate space between 50' below the deepest aquifer and the mined out Pittsburgh coal to meet this requirement with minimal rathole.

Recommendation:

The following is a proposed alternative plan for setting the 20" casing 40 feet below deepest fresh water groundwater. The alternative plan applies if the deepest freshwater is identified deeper than predicted and the Pittsburgh coal is identified at 90 feet or less from the deepest freshwater

Proposal:

Set surface casing a minimum of 40 feet below the deepest freshwater to allow 10 extra feet between the surface rathole and the mined out Pittsburgh Coal. As a result, surface cement jobs will have a higher likelihood of success by the displacement method and coal section will have adequate space to set cement basket for planned grout jobs following the shoe tack due to known void.