



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

|                                   |
|-----------------------------------|
| DEP USE ONLY                      |
| Application Tracking #<br>1264019 |

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

|                                          |                     |                   |                   |                                                    |                         |
|------------------------------------------|---------------------|-------------------|-------------------|----------------------------------------------------|-------------------------|
| Well Operator<br>Chevron Appalachia, LLC |                     | DEP ID#<br>279986 |                   | Well Permit or Registration Number<br>37-051-24688 |                         |
| Address<br>700 Cherrington Parkway       |                     |                   |                   | Well Farm Name<br>Edenborn/RGGS B                  |                         |
| City<br>Coraopolis                       |                     | State<br>PA       | Zip Code<br>15108 | Well #<br>M14H                                     | Serial #<br>37-051-1081 |
| Phone<br>412-865-2417                    | Fax<br>412-865-2403 | County<br>Fayette |                   | Municipality<br>German Township                    |                         |

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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|                                                     |      |                                               |         |
|-----------------------------------------------------|------|-----------------------------------------------|---------|
| <b>Optional: Approval by Coal Owner or Operator</b> |      | <b>Signature of Applicant / Well Operator</b> |         |
| Signature                                           | Date | Signature                                     | Date    |
|                                                     |      |                                               | 2/28/19 |
| Print or Type Signer's Name and Title               |      | Print or Type Signer's Name and Title         |         |
|                                                     |      | Kenneth D. Martz      Permitting Team Lead    |         |

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

|                               |                                                                                                    |
|-------------------------------|----------------------------------------------------------------------------------------------------|
| <b>DEP USE ONLY</b>           |                                                                                                    |
| Approved by (DEP Manager)<br> | Conditions<br><input checked="" type="checkbox"/> YES, See Attached<br><input type="checkbox"/> NO |
|                               | Date<br>4/16/19                                                                                    |

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

**Chevron Appalachia, LLC**

**German Township, Fayette County**

**Farm Name & Well Number: Edenborn M14H AUTH # 1264019  
051-24688**

**This Alternate Method is approved for work at the surface ONLY. Chevron may not run anything downhole, including not drilling out the shoe, prior to 8 hours.**



DANIEL F. COUNAHAN

DISTRICT MANAGER



DATE

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

**Attachment A**

Well Name & Number: Edenborn/RGGS B M14H

Well Permit Number: 37-051-24688

**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 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.