



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

<b>DEP USE ONLY</b>
Application Tracking #
1512463

ALT SITE ID: WLPAD - CONNER SAMUEL 17458 WELL PAD

RECEIVED  
1/14/2025

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

Well Operator <b>Range Resources Appalachia, LLC</b>		DEP ID# <b>141142</b>		Well Permit or Registration Number <b>37-125-29167</b>	
Address <b>3000 Town Center Blvd.</b>				Well Farm Name <b>CONNER SAMUEL 17458</b>	
City <b>Canonsburg</b>	State <b>PA</b>	Zip Code <b>15317</b>	Well # <b>1H</b>	Serial #	
Phone <b>724-743-6700</b>	Fax		County <b>Washington</b>	Municipality <b>Cecil</b>	

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.

The CONNER SAMUEL pad is in a known mined out area. The Pittsburgh Coal is greater than 28" thick and is anticipated to be mined out. The estimated top is at 274' GL. No other workable coal seams other than the Pittsburgh Coal are present. A mine balance cement job is anticipated to be required on the 13-3/8" Coal Protective casing string. The deepest known fresh groundwater (DFGW) within a 2,500' radius of the CONNER SAMUEL pad is correlated to a depth of 217' GL which is approximately 57' above the top of the mine void. Currently, it is not possible to set a water string at least 50' below DFGW, as well as leave enough room from the surface casing string shoe and the top of the mine for proper placement of mine baskets on the coal protective casing string (per Chapter §78a.83(c) & §78a.83(h) as shown below). Providing ample space between the surface casing seat and top of the mine will allow for the best cement coverage and isolation between DFGW and the mined-out coal. With this alternate method, we are requesting to set a surface casing string less than 50' below the DFGW but as close to the mine void as possible due to the proximity of DFGW and the estimated top of the mine void.

§78a.83. Surface and coal protective casing and cementing procedures.

(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.

(h) Unless an alternative method has been approved by the Department in accordance with § 78a.75 (relating to alternative methods), when a well is drilled through a coal seam at a location where the coal has been removed or when a well is drilled through a coal pillar, the operator shall drill to a depth of at least 30 feet but no more than 50 feet deeper than the bottom of the coal seam. The operator shall set and cement a coal protection string of casing to this depth. The operator shall equip the casing with a cement basket or other similar device above and as close to the top of the coal seam as practical.

<b>Optional: Approval by Coal Owner or Operator</b>		<b>Signature of Applicant / Well Operator</b>	
Signature	Date	Signature <i>Randi Robertson</i>	Date <b>1/8/2025</b>
Print or Type Signer's Name and Title		Print or Type Signer's Name and Title <b>Randi Robertson</b>	

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) 	Conditions <input type="checkbox"/> YES, See Attached <input checked="" type="checkbox"/> NO
	Date <b>1/28/25</b>



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Phone <b>724-743-6700</b>	Fax	County <b>Washington</b>		Municipality <b>Cecil</b>	

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25 PA Code Chapter 78a.84(f) requires that Casing which is attached to a blow-out preventer with a pressure rating of greater than 3,000 psi shall be pressure tested after cementing. A passing pressure test must be holding the anticipated maximum pressure to which the casing will be exposed for 30 minutes with not more than a 10% decrease. Certification of the pressure test shall be confirmed by entry and signature of the person performing the test on the driller's log. Range is requesting to perform a Casing Integrity Test (CIT) immediately following cementing operations and verifying the plug bumped and reducing the test from 30 minutes to 10 minutes. This will be done per API Standard 65 - Part 2, Second Edition - 12/2010 Section 5.10.2 "Regulations may require casing to be pressure tested.

Preferably, pressure testing casing should be done before significant gel strength has developed. However, such pressure testing will be limited by the pressure ratings of plugs, floats, cementing heads and other equipment. Pressure testing can be done after the cement has set but this can result in micro-annulus formation or damage to the cement sheath. The pressure should be held on the casing for the shortest length of time required to accomplish the test." Reducing the test duration to 10 minutes ensures the cement is still in its liquid phase when the pressure test is completed. Performing the test for the full 30 minutes could allow the cement to enter the critical gel phase where it transitions from a liquid to a solid. While in this critical gel phase, any disturbance of the cement could create an opportunity of microannuli to form which could affect the cement bond. In the event the plug does not bump, the cement head will be shut in to maintain final pressure balance until a minimum compressive strength of 350 psi is achieved and the CIT would then be performed per requirements in applicable statutes and regulations.

<b>Optional: Approval by Coal Owner or Operator</b>		<b>Signature of Applicant / Well Operator</b>	
Signature	Date	Signature <i>Randi Robertson</i>	Date <b>1/8/2025</b>
Print or Type Signer's Name and Title		Print or Type Signer's Name and Title <b>Randi Robertson</b>	

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<b>DEP USE ONLY</b>	
Approved by (DEP Manager)  see page 1	Conditions <input type="checkbox"/> YES, See Attached <input type="checkbox"/> NO
Date	