

8000-PM-OOGM0024 4/2012



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

DEP USE ONLY
Application Tracking # 1584051

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

Well Operator CNX GAS COMPANY LLC		DEP ID# OGO-37312		Well Permit or Registration Number 37-129-29313	
Address 1000 HORIZON VUE DRIVE ATTN: PERMITTING		159257		Well Farm Name Bell Point	
City CANONSBURG	State PA	Zip Code 15317	Well # BP6EHSM	Serial # PA1292276HSMR	
Phone 724-485-4035	Fax	County WESTMORELAND	Municipality BELL		

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.

CNX requests approval for an Alternate Method regarding 78a.84 - Casing Standards, subsection (f) "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." CNX is requesting Casing Integrity Test (CIT) duration be less than 30 minutes immediately upon placement of cement. This would have the CIT being performed before significant gel strength of the cement has developed in the wellbore in order to prevent development of a Micro-Annulus during the CIT. CNX proposes CIT duration of 10 minutes. This would be done in accordance with 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."

2. Given the drilling and completions history on offset Marcellus wells in the area, there is reasonable evidence to suggest shallow gas migration will be possible if performing a CIT were done and allowed for the creation of a microannulus. The data below represents the Zero Gel Time (ZGT) for the proposed cement blends that will be used during the drilling of this well. These times indicate the length of time that passes before the static cement begins to thicken and allow for the creation of a microannulus. Applied pressure for the CIT will be calculated based upon TVD of the shoe and the hydrostatic difference between the displacement fluid and the cement fluid, and will be Anticipated Maximum Pressure except on the 13-3/8" casing where CIT pressure will be 1000psi with Fresh Water.

- 13-3/8" (with 0% CaCl₂) - ZGT = 0:19 - 9-5/8" (with 0% CaCl₂) - ZGT = 0:17

3. Base Plan would be to bump the plug, bleed pressure off and check float valves, apply CIT pressure and then hold for 10 minutes. If floats do not hold, final lift pressure would be held until cement reached 500 psi compressive strength and CIT would be performed as per 78a.84

Optional: Approval by Coal Owner or Operator		Signature of Applicant / Well Operator	
Signature NON COAL	Date	Signature 	Date 9/15/2026
Print or Type Signer's Name and Title		Print or Type Signer's Name and Title Greg Zofchak - Drilling Engineer	

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 ☐ YES, See Attached ☒ NO Date 10/13/2026