



COGCC OPERATOR GUIDANCE

RULE 408 WELLBORE CONSTRUCTION

DOCUMENT CONTROL:

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A. Background

The purpose of this guidance is to clarify key aspects of Colorado Oil and Gas Conservation Commission's (COGCC's) rules, regulations, policies, practices, and procedures pertaining to wellbore construction.

B. Rule Reference

408.f.(1) Cementing. Operators will use the pump and plug method. An Operator will use a top plug to reduce contamination of cement from the displacement of fluid. An Operator will use a bottom plug or other Director-approved isolation technique or equipment to reduce contamination from drilling mud within the casing

408.g. Casing Centralization.

(1) **Surface casing.** At a minimum, the Operator will centralize casing as follows:

- A. Within 120 feet of the of the surface;
- B. At the casing shoe;
- C. Above and below a stage collar or diverting tool, if run; and
- D. Every fourth joint.
- E. The Operator may implement an alternative centralization plan for surface casing if approved by the Director.

C. Guidance

For Rule 408.f.(1) the COGCC considers the use of a fluid spacer with sufficient volume to minimize cement contamination from drilling mud in place of a bottom plug an

adequate isolation technique. Engineered spacers are to be compatible with the drilling mud to reduce contamination of the cement.

If an operator intends to use an alternative centralization plan for surface casing per Rule 408.g.(1)E it should be described on the Form 2 Application for Permit to Drill. For changes to the surface casing centralization plan after approval of the Form 2 the operator will submit a Form 4 Sundry Notice that describes the alternative plan.

Document Change Log

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