



OPERATOR GUIDANCE

RULE 312 - SUBSEQUENT OPERATIONS ON EXISTING WELLS

Document Change Log

Change Date	Description of Changes
04-27-2021	Guidance finalized
05-20-2021	Moved bradenhead testing to routine well maintenance
09-21-2021	Updated to include form submission details

Rule Citation

312. SUBSEQUENT OPERATIONS ON EXISTING WELLS

a. The Operator will submit and obtain the Director's approval of a Form 4 before conducting any subsequent Well operations involving heavy equipment, except for routine Well maintenance.

b. Verbal Approval. If during the course of the subsequent operations or routine Well maintenance the Operator determines that additional subsequent operations involving heavy equipment that are not routine maintenance are necessary, the Operator may obtain verbal approval from the Director to conduct the subsequent operations. If the Operator obtains verbal approval from the Director, the Operator will submit a Form 4 to obtain written approval from the Director within 7 days.

c. Information Requirements. The Form 4 will describe the details of the proposed work.

d. Approval of Subsequent Well Operations. The Director may approve a Form 4 that complies with all requirements of the Commission's Rules, and protects and minimizes adverse impacts to public health, safety, welfare, the environment, and wildlife resources.

(1) The Director may add any conditions of the approval to a Form 4 that are necessary and reasonable to ensure compliance with all requirements of the Commission's Rules, or to protect and minimize adverse impacts to public health, safety, welfare, the environment, and wildlife resources.

(2) The Director will review the Oil and Gas Location where the Well is located to ensure that necessary and reasonable conditions of approval are applied to protect and minimize adverse impacts to public health, safety, welfare, the environment, and wildlife resources.

e. Notice Requirements. An Operator will provide notice of operations covered by Rule 312.a to the Surface Owner pursuant to Rule 412.a.(4).

Related Rule Citation

RULE 408.e.(9)

Prior written approval from the Director on a Form 4 is required before commencing any of the following operations:

- A. Pumping cement down the Bradenhead access to the Annulus between the production casing (or intermediate casing, if present) and surface casing;
- B. All routine or planned casing repair operations; or
- C. Any other changes to the casing or cement in the wellbore.

Purpose of Rule

An operator will provide notice to the surface owner, and the operator will submit a Form 4 describing the planned operation before conducting subsequent well operations that involve heavy equipment, with the exception of routine well maintenance. The operator will obtain the Director's approval of the Form 4 prior to commencing the subsequent well operations. Different types of well operations that are subject to the Form 4 requirement and exceptions are described below in the guidance section of this document. COGCC's engineering staff and oil and gas location assessment staff will review the Form 4 for wellbore considerations and potential surface impacts, respectively. The Director may apply Conditions of Approval necessary to protect public health, safety, welfare, the environment, or wildlife resources.

In circumstances where providing written notification and obtaining written approval may cause undue delays that could harm public health, safety, welfare, the environment, or wildlife resources, the operator will provide verbal notification to the Director. The Director will consider approving the request verbally, or the Director will advise the operator to submit a Form 4 for COGCC staff review before approving the subsequent well operation.

Rule 312 Guidance

Subsequent Well Operations

The operator will file a Form 4 for subsequent well operations, *other* than routine well maintenance, that require the use of heavy equipment. The Form 4 must be approved before the operator commences the operations.

Subsequent well operations that require an approved Form 4 include, but are not limited to:

1. Any completion operation that is performed 120 days or more after the drilling rig is released from a well pad;

2. Coiled tubing or snubbing operations that are not otherwise part of ongoing completion operations;
3. Any well operation that is listed in Rule 408.e.(9):
 - a. Pumping cement down the Bradenhead access to the Annulus between the production casing (or intermediate casing, if present) and surface casing;
 - b. All routine or planned casing repair operations; and
 - c. Any other changes to the casing or cement in the wellbore, such as installing a liner.
4. Situations that occur during subsequent well operations previously approved on a Form 4 that result in a significant increase of heavy equipment, such as a well control event; and
5. Plugging operations, if the Form 6 Notice of Intent to Abandon was approved prior to January 15, 2021.

Routine Well Maintenance

Examples of routine Well maintenance that DO NOT require an approved Form 4 include:

- A. Pump Changes
- B. Tubing Repairs
- C. Plunger Retrievals
- D. Bradenhead tests, diagnostic testing or mitigation conducted during daylight hours for less than seven consecutive days
- E. Any other work at the well that is performed at least once per month during daylight hours with a duration of no more than one day

A Form 4 is NOT required for these operations *even if heavy equipment is used*.

Notice Requirements

Subsequent Well Operations and Routine Well Maintenance may be subject to the notice requirements of Rule 405.e.(2)-(3) and Rule 412.a.(4).

How to Submit Form 4

The operator will submit a Form 4 by API Number of the Well for the following activities:

1. Rule 408.e.(9) casing repairs and any changes to the casing or cement configuration in the well
2. Bradenhead tests, diagnostic testing, or mitigation when a blowdown tank is used
3. Plugging operations, if the Form 6 Notice of Intent to Abandon was approved prior to January 15, 2021
4. Subsequent well operations where rules require well-specific attachments, such as a wellbore diagram

For all operations subject to the requirements of Rule 408.e.(9), the operator will attach a workover procedure to the Form 4.

The operator will submit a Form 4 by ID Number of the Location with a brief description of the operation for the following activities:

1. Subsequent Well Operations that do not require any well-specific information other than the well name, well number, and API Number
2. Commencement of completions operations more than 120 days after rig release
3. Coiled tubing or snubbing operations that are not otherwise part of ongoing completion operations
4. When performing these activities for multiple wells on the same location, the operator will list the wells on the form

For subsequent well operations where a procedure or plan was previously approved by the Director, such as a bradenhead Pressure Management Plan, the operator may refer to the COGCC Document Number of the approved procedure, plan, or exhibit in the comments on the Form 4, rather than reiterating the same operations on the Form 4.

Form 4 is a multipurpose form and may be used to comply with more than one rule. As an example for a casing repair, the operator may submit a single Form 4, checking boxes for Rule 312 compliance and "Repair Well."