



April 9, 2013

**AOGCC Industry Guidance Bulletin 13-001**  
Remedial Cementing (aka "Top Job") for Surface Casing

Alaska Oil and Gas Conservation Commission (AOGCC) regulations governing cementing are found at 20 AAC 25.030. Paragraph (d)(4) requires the annular space of surface casing (conductor-surface casing annulus) to be filled with cement from the casing shoe to the surface. An inadequate primary cement job is evidenced by cement not circulated to surface, an excessive quantity of cement circulated to surface, or results of a formation integrity test that indicate insufficient integrity of the casing shoe.

Regulation 20 AAC 25.030(d)(4) continues with required actions if an inadequate surface casing cement job occurs. The operator shall:

- notify AOGCC before drilling ahead, AND
- evaluate adequacy as described (cement quality log or other AOGCC approved method), AND
- take remedial action as necessary to meet the design requirements of a well casing and cementing program as outlined in 20 AAC 25.030(a).

The following clarification is provided to address **actions that are to be taken in response to inadequate surface casing cementing**:

- Contact AOGCC as soon as become aware of inadequate cementing using notification procedures outlined in AOGCC Industry Guidance Bulletin 10-01A;
- Prepare a plan for remedial cementing and submit to AOGCC for review and approval (email submittal is acceptable); an Application for Sundry Approvals (Form 10-403) is required;
  - Include details about primary cement job – volume pumped; any diagnostics prior to cement job to confirm hole size/volume cement needed (e.g., tracer); problems during cement job; is gas bubbling/flowing?; etc.
- Notify AOGCC Inspectors for an opportunity to witness the procedure that will be used to determine top of primary cement in the conductor-surface casing annulus;
- Run small diameter pipe or other conduit to top of cement and pump "top job" per approved procedure;
- If cannot definitively identify the primary cement top, notify AOGCC **before** pumping cement and discuss options;

Please share this Guidance Bulletin with all appropriate members of your organizations. Questions regarding this guidance should be directed to James Regg at (907) 793-1236.

Sincerely,

  
Cathy P. Foerster  
Chair, Commissioner