

## Oil & Gas Division

Dear Operator:

Re: Testing of Inactive Older Wells Required  
**Test Report Due Date: See Attached List**

### **Please read this entire letter; it contains important information about your H-15 testing requirements, including changes to the requirements.**

According to Railroad Commission records, you are the operator of the inactive wells on the attached listing. Each well is in a wellbore that must be tested to show no threat of pollution as required by Statewide Rule 14(b)(3).

#### **Statewide Rule 14, *Plugging***

According to Statewide Rule 14, any wellbore 25 or more years old and inactive one year or more must be tested to ensure it poses no potential pollution threat to natural resources including surface and subsurface water, oil, and gas.

An **annual fluid level test** must indicate an adequate separation between the deepest usable-quality water at the location of the wellbore and the top of fluid in the wellbore.

As an alternative to the annual fluid level test, you may perform a **mechanical integrity test**. If the integrity test is successful, no other test is required for up to five years. A mechanical integrity test that has been conducted successfully within the preceding five years where the results are on file with the Commission may be acceptable.

After receipt of this notice, it is advisable to test wells and report results as far in advance of the deadline as you can. This will allow prompt review and processing of the reports. Failure to test a well subject to the testing provisions of Statewide Rule 14(b)(3) and report the results by the specified date will result in 14(b)(2) extension cancellations and P-4 certificate of compliance cancellation and pipeline severance, and may also result in legal enforcement referral.

**THE ATTACHED LISTING.** On the attached listing are wells that have previously undergone testing and are now due for their test, as well as wells due for their initial test. It does not include: (1) injection wells with an approved H-5 mechanical integrity test conducted within the past five years; (2) wells with a successful H-15 mechanical integrity test report to the commission within the preceding five years of the due date; or (3) wells delinquent or otherwise not yet in compliance with previously required H-15 testing.

The following notations may appear on your listing:

- “\*” The identified well is one completion in a multiple-completion inactive wellbore. Only one test and one H-15 report for the wellbore is necessary. Follow instructions on the H-15 when reporting the test.
- “00/00/00” The identified well is one for which Railroad Commission records have no historical wellbore date (drill, spud, or initial completion date). Absence of a historical date indicates an older wellbore; because of this, unless you are able to document that the well is less than 25 years old, Statewide Rule 14(b)(3) testing is required. File a Form H-15 on a “no date” well even if you do not test it because your records show an age of less than 25 years old. Regardless of whether you test the well, **attach any documentation on the wellbore age you have** so that Commission records may be updated. Copies of old completion papers, well records cards, etc., should be acceptable.

(over)

**BRINGING WELLS BACK ON PRODUCTION.** Statewide Rule 14 requires that, **for any well subject to the H-15 testing requirements, you must perform a successful H-15 test before the well is returned to active operation.** Under Rule 14, a well has not returned to active operation until the operator has reported greater than minimal production (at least 10 barrels of oil for oil wells, or 100 MCF of gas for gas wells) for three consecutive months. If you are in the process of returning a well to active operation and have not yet met this minimal production requirement as of the date of this letter, then your well must be tested. If a successful test is not performed on your well as required, then your well will be considered “inactive” for purposes of Rule 14 regardless of the amount and duration of production. **Note:** if, as of the date that the well has satisfied the requirements of Rule 14 for a return to production, there has been a successful fluid level test within 12 months or a successful mechanical integrity test within 60 months on file with the Commission, then that test will satisfy this requirement.

**DISCREPANCY BETWEEN THE COMMISSION LISTING AND YOUR RECORDS.** If the information in your records differs from that on the listing, list both the information from the listing and from your files in the appropriate area of Form H-15. Include remarks on the form as needed for explanation.

- Indicate historical wellbore date discrepancies only if the difference is more than one year. If you are able to supply (Item No. 7) the date for a “00/00/00” well, please do so. In either case, **attach supporting documentation** (W-2, G-1, well card, etc.).
- If there are differences in API, lease, and/or well identification information, supply location information in Item No. 16 on the H-15 form.
- If you do not test the wellbore because of a change of status (the wellbore is plugged, has gone back on production or become an active injection well, etc.) or change of operator, complete the H-15 identification areas, sign the H-15, attach a copy of supporting documentation (approved W-3A, W-3, W-2, G-1, H-10, P-4, etc.), and file the H-15 with the Commission in Austin.

**PRIOR NOTICE REQUIRED FOR H-15 TESTS.** Statewide Rule 14 requires **at least 48 hours notice to the appropriate district office** before conducting H-15 tests. This applies to Fluid Level tests as well as mechanical integrity tests. If you plan to conduct a mechanical integrity test, the district office will approve the type of mechanical integrity test and advise of the documentation that must be filed with the H-15 test report.

**REPORTING TEST RESULTS.** Report the test results on Form H-15, *Test on an Inactive Well More than 25 Years Old*. A supply of the form may be obtained by mail: Supply Department, Railroad Commission of Texas, P.O. Box 12967, Austin, Texas 78711-2967. Limited supplies of the H-15 are available at the Commission’s district offices. This form is also available on the Commission’s website.

**FILING THE FORM H-15 TEST REPORT.** The H-15 report is to be filed with the Commission within 30 days after the test is conducted unless it is a mechanical integrity test where the results are already on file with the Commission.

- **FLUID LEVEL TEST:** File the H-15 (original only, no attachments other than those mentioned in the “Discrepancy” section above) reporting the results of a fluid level test with the Railroad Commission of Texas, Oil and Gas Division, P.O. Box 12967, Austin, Texas 78711-2967
- **MECHANICAL INTEGRITY TEST:** File the H-15 (original and one copy of the H-15 along with one set of attachments as directed by the district office and/or as mentioned in the “discrepancy” section above) reporting the results of a mechanical integrity test with the appropriate district office. If the H-15 is based on prior mechanical integrity test results, attach a copy of the originally filed H-15 or H-5, *Disposal/Injection Well Pressure Test Report*.

**ELECTRONIC FILING OF REPORTS:** Operators with multiple H-15 reports to file may wish to investigate the Electronic Data Interchange (EDI) process for electronic filing. For information on the EDI system, please contact (512) 463-4590

If you have any questions, please contact either the appropriate district office, or [H-15info@rrc.state.tx.us](mailto:H-15info@rrc.state.tx.us), 512-463-6830 in the Commission’s Austin office.