# UNITED STATES DEPARTMENT OF THE INTERIOR BUREAU OF LAND MANAGEMENT

OCD - HOBBS 10/06/2020 RECEIVED

FORM APPROVED OMB No. 1004-0137 Expires: January 31, 2018

	Expires: January 31, 2013
5. Lease	Serial No.

6. If Indian, Allotee or Tribe Name

NMLC0066438

APPLICATION FOR PERMIT TO DRILL OR REENTER
--

1a. Type of work:	EENTEI	₹		7. If Unit or CA Agr				
1b. Type of Well: ✓ Oil Well ☐ Gas Well ☐ Oth	her			BELL LAKE / NMN		292X		
1c. Type of Completion: Hydraulic Fracturing	ngle Zoı	ne Multiple Zone		8. Lease Name and BELL LAKE UNIT				
y y a a y a a a a a a a a a a a a a a a	8			[3167				
				203H				
Name of Operator     KAISER FRANCIS OIL COMPANY [12361]				O A DI Wall No	0-025	-47836		
3a. Address	3b. Pho	one No. (include area cod	le)	10. Field and Pool,	_	. [		
6733 S. Yale Ave., Tulsa, OK 74121	(918) 4	491-0000		OJO CHISO/WOL	FCAMP,	SOUTHWEST		
4. Location of Well (Report location clearly and in accordance w	vith any	State requirements.*)		11. Sec., T. R. M. or		Survey or Area		
At surface SWNE / 1900 FNL / 2220 FEL / LAT 32.3356	6947 / 1	LONG -103.5246897		SEC 1/T23S/R33E	/NMP			
At proposed prod. zone SESW / 330 FSL / 2110 FWL / LA	AT 32.3	3128092 / LONG -103.5	277917					
14. Distance in miles and direction from nearest town or post office 20 miles	ce*			12. County or Parisl LEA	h	13. State NM		
15. Distance from proposed* 420 feet	16. No	of acres in lease	17. Spacii	ng Unit dedicated to the	his well			
location to nearest	479.85		480.0	<b>—</b>				
(Also to nearest drig. unit line, if any)	470.00		100.0					
18. Distance from proposed location*	19. Pro	oposed Depth	20. BLM/	BIA Bond No. in file				
to nearest well, drilling, completed, applied for, on this lease, ft.	10472	feet / 19322 feet	FED: W	YB000055				
21. Elevations (Show whether DF, KDB, RT, GL, etc.)	22. Ap	proximate date work will	start*	23. Estimated durati	ion			
3518 feet	04/01/	2020		40 days				
	24. /	Attachments						
The following, completed in accordance with the requirements of (as applicable)	Onshor	e Oil and Gas Order No. 1	I, and the H	Iydraulic Fracturing r	ule per 43	3 CFR 3162.3-3		
1. Well plat certified by a registered surveyor.		4 Bond to cover th	ne operation	ns unless covered by an	n existing	bond on file (see		
2. A Drilling Plan.		Item 20 above).	ie operation	is unless covered by ai	ii existing	bond on the (see		
3. A Surface Use Plan (if the location is on National Forest System								
SUPO must be filed with the appropriate Forest Service Office)	).	6. Such other site sp BLM.	pecific infor	mation and/or plans as	may be r	equested by the		
25. Signature	1	Name (Printed/Typed)			Date			
(Electronic Submission)		STORMI DAVIŠ <sup>1</sup> / Ph: (9	918) 491-0	0000	01/14/2	2020		
Title								
Regulatory Analyst								
Approved by (Signature)		Name (Printed/Typed)	004 5055		Date			
(Electronic Submission)		Cody Layton / Ph: (575)	234-5959		09/15/2	2020		
Title Assistant Field Manager Lands & Minerals		Office Carlsbad Field Office						
Application approval does not warrant or certify that the applicant			nose rights	in the subject lease w	hich wou	ld entitle the		
applicant to conduct operations thereon.	. 110103 1	-5a. or equinione time to ti		the subject lease w	<b>.</b> wou	ontine the		
Conditions of approval, if any, are attached.								
Title 18 U.S.C. Section 1001 and Title 43 U.S.C. Section 1212, ma	ake it a	crime for any person know	wingly and	willfully to make to a	ny depar	tment or agency		

GCP Rec 10/06/2020



of the United States any false, fictitious or fraudulent statements or representations as to any matter within its jurisdiction.



SL

\*(Instructions on page 2)

#### INSTRUCTIONS

GENERAL: This form is designed for submitting proposals to perform certain well operations, as indicated on Federal and Indian lands and leases for action by appropriate Federal agencies, pursuant to applicable Federal laws and regulations. Any necessary special instructions concerning the use of this form and the number of copies to be submitted, particularly with regard to local, area, or regional procedures and practices, either are shown below or will be issued by, or may be obtained from local Federal offices.

ITEM I: If the proposal is to redrill to the same reservoir at a different subsurface location or to a new reservoir, use this form with appropriate notations. Consult applicable Federal regulations concerning subsequent work proposals or reports on the well.

ITEM 4: Locations on Federal or Indian land should be described in accordance with Federal requirements. Consult local Federal offices for specific instructions.

ITEM 14: Needed only when location of well cannot readily be found by road from the land or lease description. A plat, or plats, separate or on the reverse side, showing the roads to, and the surveyed location of, the wen, and any other required information, should be furnished when required by Federal agency offices.

ITEMS 15 AND 18: If well is to be, or has been directionany drilled, give distances for subsurface location of hole in any present or objective productive zone.

ITEM 22: Consult applicable Federal regulations, or appropriate officials, concerning approval of the proposal before operations are started.

ITEM 24: If the proposal will involve hydraulic fracturing operations, you must comply with 43 CFR 3162.3-3, including providing information about the protection of usable water. Operators should provide the best available information about all formations containing water and their depths. This information could include data and interpretation of resistivity logs run on nearby wells. Information may also be obtained from state or tribal regulatory agencies and from local BLM offices.

#### NOTICES

The Privacy Act of 1974 and regulation in 43 CFR 2.48( d) provide that you be furnished the following information in connection with information required by this application.

AUTHORITY: 30 U.S.C. 181 et seq., 25 U.S.C. 396; 43 CFR 3160

PRINCIPAL PURPOSES: The information will be used to: (1) process and evaluate your application for a permit to drill a new oil, gas, or service wen or to reenter a plugged and abandoned well; and (2) document, for administrative use, information for the management, disposal and use of National Resource Lands and resources including (a) analyzing your proposal to discover and extract the Federal or Indian resources encountered; (b) reviewing procedures and equipment and the projected impact on the land involved; and (c) evaluating the effects of the proposed operation on the surface and subsurface water and other environmental impacts.

ROUTINE USE: Information from the record and/or the record win be transferred to appropriate Federal, State, and local or foreign agencies, when relevant to civil, criminal or regulatory investigations or prosecution, in connection with congressional inquiries and for regulatory responsibilities.

EFFECT OF NOT PROVIDING INFORMATION: Filing of this application and disclosure of the information is mandatory only if you elect to initiate a drilling or reentry operation on an oil and gas lease.

The Paperwork Reduction Act of 1995 requires us to inform you that:

The BLM conects this information to anow evaluation of the technical, safety, and environmental factors involved with drilling for oil and/or gas on Federal and Indian oil and gas leases. This information will be used to analyze and approve applications. Response to this request is mandatory only if the operator elects to initiate drilling or reentry operations on an oil and gas lease. The BLM would like you to know that you do not have to respond to this or any other Federal agency-sponsored information collection unless it displays a currently valid OMB control number.

**BURDEN HOURS STATEMENT:** Public reporting burden for this form is estimated to average 8 hours per response, including the time for reviewing instructions, gathering and maintaining data, and completing and reviewing the form. Direct comments regarding the burden estimate or any other aspect of this form to U.S. Department of the Interior, Bureau of Land Management (1004-0137), Bureau Information Conection Clearance Officer (WO-630), 1849 C Street, N.W., Mail Stop 401 LS, Washington, D.C. 20240.



**Email address:** 

# Operator Certification Data Report

## **Operator Certification**

I hereby certify that I, or someone under my direct supervision, have inspected the drill site and access route proposed herein; that I am familiar with the conditions which currently exist; that I have full knowledge of state and Federal laws applicable to this operation; that the statements made in this APD package are, to the best of my knowledge, true and correct; and that the work associated with the operations proposed herein will be performed in conformity with this APD package and the terms and conditions under which it is approved. I also certify that I, or the company I represent, am responsible for the operations conducted under this application. These statements are subject to the provisions of 18 U.S.C. 1001 for the filing of false statements.

NAME: Stormi Davis		<b>Signed on:</b> 01/14/2020
Title: Regulatory Analyst		
Street Address: 106 W. Riverside	e Drive	
City: Carlsbad	State: NM	<b>Zip:</b> 88220
<b>Phone:</b> (575)308-3765		
Email address: nmogrservices@	gmail.com	
Field Representative	е	
Representative Name:		
Street Address:		
City:	State:	Zip:
Phone:		



U.S. Department of the Interior BUREAU OF LAND MANAGEMENT

Well Name: BELL LAKE UNIT NORTH

## Application Data Report

**APD ID:** 10400053157 **Submission Date:** 01/14/2020

**Operator Name: KAISER FRANCIS OIL COMPANY** 

Well Number: 203H

Well Type: OIL WELL Well Work Type: Drill

Highlighted data reflects the most recent changes

**Show Final Text** 

#### **Section 1 - General**

BLM Office: CARLSBAD User: Stormi Davis Title: Regulatory Analyst

Federal/Indian APD: FED Is the first lease penetrated for production Federal or Indian? FED

Lease number: NMLC0066438 Lease Acres: 479.85

Surface access agreement in place? Allotted? Reservation:

Agreement in place? YES Federal or Indian agreement: FEDERAL

Agreement number: NMNM068292X

Agreement name: BELL LAKE

Keep application confidential? Y

Permitting Agent? YES APD Operator: KAISER FRANCIS OIL COMPANY

Operator letter of designation:

## **Operator Info**

Operator Organization Name: KAISER FRANCIS OIL COMPANY

Operator Address: 6733 S. Yale Ave.

Operator PO Box: PO Box 21468

Operator City: Tulsa State: OK

Operator Phone: (918)491-0000 Operator Internet Address:

#### **Section 2 - Well Information**

Well in Master Development Plan? NO Master Development Plan name:

Well in Master SUPO? NO Master SUPO name:

Well in Master Drilling Plan? NO Master Drilling Plan name:

Well Name: BELL LAKE UNIT NORTH Well Number: 203H Well API Number:

Field/Pool or Exploratory? Field and Pool Field Name: OJO CHISO Pool Name: WOLFCAMP,

SOUTHWEST

**Zip:** 74121

Is the proposed well in an area containing other mineral resources? NATURAL GAS,OIL

Page 1 of 3

Well Name: BELL LAKE UNIT NORTH Well Number: 203H

Is the proposed well in an area containing other mineral resources? NATURAL GAS,OIL

Is the proposed well in a Helium production area? N Use Existing Well Pad? N New surface disturbance?

Type of Well Pad: MULTIPLE WELL Multiple Well Pad Name: Number: 2

Well Class: HORIZONTAL NORTH BELL LAKE UNIT
Number of Legs: 1

Well Work Type: Drill
Well Type: OIL WELL
Describe Well Type:

Well sub-Type: EXPLORATORY (WILDCAT)

Describe sub-type:

Distance to town: 20 Miles Distance to nearest well: 30 FT Distance to lease line: 420 FT

Reservoir well spacing assigned acres Measurement: 480 Acres

Well plat: Pay.gov 20200113102811.pdf

BELL\_LAKE\_UNIT\_NORTH\_203H\_C102\_20200113102813.pdf

Well work start Date: 04/01/2020 Duration: 40 DAYS

#### **Section 3 - Well Location Table**

Survey Type: RECTANGULAR

**Describe Survey Type:** 

Datum: NAD83 Vertical Datum: NAVD88

Survey number: 7622 Reference Datum: GROUND LEVEL

Wellbore	NS-Foot	NS Indicator	EW-Foot	EW Indicator	Twsp	Range	Section	Aliquot/Lot/Tract	Latitude	Longitude	County	State	Meridian	Lease Type	Lease Number	Elevation	MD	TVD	Will this well produce from this lease?
SHL Leg #1	190 0	FNL	222 0	FEL	23S	33E	1	Aliquot SWNE	32.33569 47	- 103.5246 897	LEA	NEW MEXI CO	114-44	F	NMLC0 068387	351 8	0	0	N
KOP Leg #1	190 0	FNL	222 0	FEL	23S	33E	1	Aliquot SWNE	32.33569 47	- 103.5246 897	LEA		NEW MEXI CO	F	NMLC0 068387	- 637 7	989 5	989 5	N

Well Name: BELL LAKE UNIT NORTH Well Number: 203H

Wellbore	NS-Foot	NS Indicator	EW-Foot	EW Indicator	Twsp	Range	Section	Aliquot/Lot/Tract	Latitude	Longitude	County	State	Meridian	Lease Type	Lease Number	Elevation	MD	TVD	Will this well produce from this lease?
PPP Leg #1-1	205 5	FNL	264 0	FW L	23S	33E	1	Aliquot SENW	32.33526 77	- 103.5260 641	LEA	NEW MEXI CO	—	F	NMLC0 066438	- 693 7	106 70	104 55	Y
PPP Leg #1-2	260 0	FSL	213 0	FW L	23S	33E	1	Aliquot NESW	32.33356 07	- 103.5277 406	LEA	NEW MEXI CO	—	F		- 695 4	115 47	104 72	Y
PPP Leg #1-3	0	FNL	213 0	FEL	23S	33E	12	Aliquot NENW	32.32654 3	- 103.5277 602	LEA	NEW MEXI CO		S	STATE	- 695 2	141 47	104 70	Y
EXIT Leg #1	330	FSL	211 0	FW L	23S	33E	12	I	32.31280 92	- 103.5277 917	LEA	NEW MEXI CO		S	STATE	- 695 4	193 22	104 72	Y
BHL Leg #1	330	FSL	211 0	FW L	23S	33E	12	Aliquot SESW	32.31280 92	- 103.5277 917	LEA	NEW MEXI CO		s	STATE	- 695 4	193 22	104 72	Y



## Pay.gov Payment Confirmation: BLM Oil and Gas Online Payment

1 message

**notification@pay.gov** <notification@pay.gov> To: nmogrservices@gmail.com

Mon, Jan 13, 2020 at 10:24 AM



An official email of the United States government



Your payment has been submitted to Pay.gov and the details are below. If you have any questions regarding this payment, please contact BLM OC CBS Customer Service at (303) 236-6795 or BLM\_OC\_CBS\_Customer\_Service@blm.gov.

Application Name: BLM Oil and Gas Online Payment

Pay.gov Tracking ID: 26MPSGN3 Agency Tracking ID: 75927289463

Transaction Type: Sale

Transaction Date: 01/13/2020 12:24:44 PM EST

Account Holder Name: George B Kaiser

Transaction Amount: \$10,230.00

Card Type: Visa

Card Number: \*\*\*\*\*\*\*\*0061

Company: Kaiser-Francis Oil Company

APD IDs: 10400053157

Lease Numbers: NMLC0066438

Well Numbers: 203H

Note: You will need your Pay.gov Tracking ID to complete your APD transaction in AFMSS II. Please ensure

you write this number down upon completion of payment.

THIS IS AN AUTOMATED MESSAGE. PLEASE DO NOT REPLY.



Pay.gov is a program of the U.S. Department of the Treasury, Bureau of the Fiscal Service

District I

1625 N. French Dr., Hobbs, NM 88240 Phone: (575) 393-6161 Fax: (575) 393-0720 District II

811 S. First St., Artesia, NM 88210 Phone: (575) 748-1283 Fax: (575) 748-9720

<u>District III</u> 1000 Rio Brazos Road, Aztec, NM 87410 Phone: (505) 334-6178 Fax: (505) 334-6170

District IV

1220 S. St. Francis Dr., Santa Fe, NM 87505 Phone: (505) 476-3460 Fax: (505) 476-3462

480

# State of New Mexico Energy, Minerals & Natural Resources Department

1220 South St. Francis Dr. Santa Fe, NM 87505

**OIL CONSERVATION DIVISION** 

Form C-102 Revised August 1, 2011 Submit one copy to appropriate District Office

☐ AMENDED REPORT

#### WELL LOCATION AND ACREAGE DEDICATION PLAT

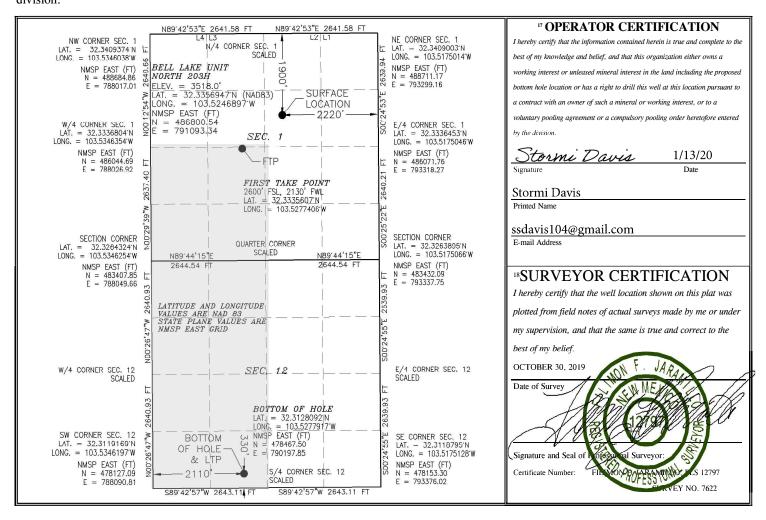
<sup>1</sup> API Numbe	er	<sup>2</sup> Pool Code	<sup>3</sup> Pool Name	
30-025-		98259	Ojo Chiso; Bone Spring, Sou	ıthwest
<sup>4</sup> Property Code		<sup>5</sup> Pr	operty Name	<sup>6</sup> Well Number
		BELL LAK	203H	
<sup>7</sup> OGRID No.		8 O <sub>I</sub>	perator Name	<sup>9</sup> Elevation
12361		KAISER-FRAN	NCIS OIL COMPANY	3518.0

#### Surface Location

UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County		
G	1	23 S	33 E	1900 NORTH 2220		EAST	LEA				
<sup>11</sup> Bottom Hole Location If Different From Surface											
UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County		
N	12	23 S	33 E		330	SOUTH	2110	WEST	LEA		
12 Dedicated Acres 13 Joint or Infill 14 Consolidation Code 15 Order No.											

No allowable will be assigned to this completion until all interests have been consolidated or a non-standard unit has been approved by the division.

R-14527A





#### U.S. Department of the Interior BUREAU OF LAND MANAGEMENT

## **Drilling Plan Data Report**

09/16/2020

**APD ID**: 10400053157

Well Type: OIL WELL

**Submission Date:** 01/14/2020

Highlighted data reflects the most recent changes

Operator Name: KAISER FRANCIS OIL COMPANY

Well Number: 203H

**Show Final Text** 

Well Name: BELL LAKE UNIT NORTH

Well Work Type: Drill

## **Section 1 - Geologic Formations**

Formation			True Vertical	Measured			Producing
ID	Formation Name	Elevation	Depth	Depth	Lithologies	Mineral Resources	_
633677		3518	0	0	OTHER : Surface	NONE	N
633678	RUSTLER	2296	1222	1222	SANDSTONE	NONE	N
633679	SALADO	2046	1472	1472	SALT	NONE	N
633680	TOP SALT	1721	1797	1797	SALT	NONE	N
633681	BASE OF SALT	-1229	4747	4747	SALT	NONE	N
633682	LAMAR	-1504	5022	5022	SANDSTONE	NATURAL GAS, OIL	N
633683	BELL CANYON	-1804	5322	5322	SANDSTONE	NATURAL GAS, OIL	N
633684	CHERRY CANYON	-3054	6572	6572	SANDSTONE	NATURAL GAS, OIL	N
633685	BRUSHY CANYON	-4704	8222	8222	SANDSTONE	NATURAL GAS, OIL	N
633686	BONE SPRING	-4929	8447	8447	LIMESTONE	NATURAL GAS, OIL	N
633687	AVALON SAND	-5284	8802	8802	SANDSTONE	NATURAL GAS, OIL	N
633688	BONE SPRING 1ST	-6229	9747	9747	SANDSTONE	NATURAL GAS, OIL	N
633695	BONE SPRING 2ND	-6754	10272	10272	SANDSTONE	NATURAL GAS, OIL	Y

**Section 2 - Blowout Prevention** 

Well Name: BELL LAKE UNIT NORTH Well Number: 203H

Pressure Rating (PSI): 5M Rating Depth: 13000

**Equipment:** A 5M system will be installed according to Onshore Order #2 consisting of an Annular Preventer, BOP with two rams, a blind ram and safety valves and appropriate handles located on the rig floor. BOP will be equipped with 2 side outlets (choke side shall be a minimum 3 line, and kill side will be a minimum 2 line). Kill line will be installed with (2) valves and a check valve (2 min) of proper pressure rating for the system. Remote kill line (2 min) will be installed and ran to the outer edge of the substructure and be unobstructed. A manual and hydraulic valve (3 min) will be installed on the choke line, 3 chokes will be used with one being remotely controlled. Fill up line will be installed above the uppermost preventer. Pressure gauge of proper pressure rating will be installed on choke manifold. Upper and lower kelly cocks will be utilized with handles readily available in plain sight. A float sub will be available at all times. All connections subject to well pressure will be flanged, welded, or clamped.

Requesting Variance? YES

Variance request: Flex Hose Variance Annular BOP Variance

**Testing Procedure:** BOP/BOPE will be tested by an independent service company to 250 psi low and the high pressure indicated above per Onshore Order 2 requirements. The System may be upgraded to a higher pressure but still tested to the working pressure listed in the table above. If the system is upgraded all of the components installed will be functional and tested.

#### **Choke Diagram Attachment:**

BLUN 203H Choke Manifold 20200114080015.pdf

#### **BOP Diagram Attachment:**

BLUN 203H BOP 20200114080035.pdf

Cactus\_Flex\_Hose\_16C\_Certification\_20200114080043.pdf

Well Control Plan 20200114080111.pdf

Well Head Diagram 20200114080117.pdf

Annular\_BOP\_Variance\_Request\_20200827130555.pdf

#### **Section 3 - Casing**

Casing ID	String Type	Hole Size	Csg Size	Condition	Standard	Tapered String	Top Set MD	Bottom Set MD	Top Set TVD	Bottom Set TVD	Top Set MSL	Bottom Set MSL	Calculated casing length MD	Grade	Weight	Joint Type	Collapse SF	Burst SF	Joint SF Type	Joint SF	Body SF Type	Body SF
1	SURFACE	17.5	13.375	NEW	API	N	0	1400	0	1400	3518	2118	1400	J-55	54.5	BUTT	1.9	4.6	DRY	13.1	DRY	12.3
2	INTERMED IATE	12.2 5	9.625	NEW	API	N	0	5022	0	5022		-1504	5022	HCP -110	40	LT&C	1.8	3.4	DRY	6.3	DRY	6.3
3	PRODUCTI ON	8.75	5.5	NEW	API	N	0	19322	0	10472		-6954	19322	P- 110		OTHER - GB CD Butt	2.3	2.6	DRY	3.2	DRY	3.1

**Casing Attachments** 

Well Name: BELL LAKE UNIT NORTH Well Number: 203H

Casing ID: 1	String Type:SURFACE	
Inspection Documen	t:	
Spec Document:		
Tapered String Spec		
Casing Design Assur	nptions and Worksheet(s):	
BLUN_203H_Ca	asing_Assumptions_20200827132221.pdf	
Casing ID: 2	String Type: INTERMEDIATE	
Inspection Documen	: , ,	
Spec Document:		
Tapered String Spec		

Casing Design Assumptions and Worksheet(s):

BLUN\_203H\_Casing\_Assumptions\_20200827132149.pdf

Casing ID: 3 String Type: PRODUCTION

**Inspection Document:** 

**Spec Document:** 

**Tapered String Spec:** 

Casing Design Assumptions and Worksheet(s):

GBCD\_5.5in\_Connection\_Spec\_Sheet\_20190926071942.pdf

BLUN\_203H\_Casing\_Assumptions\_20200827132204.pdf

Well Name: BELL LAKE UNIT NORTH Well Number: 203H

String Type	Lead/Tail	Stage Tool Depth	Top MD	Bottom MD	Quantity(sx)	Yield	Density	Cu Ft	Excess%	Cement type	Additives
SURFACE	Lead		0	1400	695	1.74	13.5	1214	75	HALCEM	4% Bentonite
SURFACE	Tail		0	1400	248	1.3	14.8	331	75	HalCem	0.125 #/sk Poly Flake
INTERMEDIATE	Lead		0	5022	787	2.08	12.5	1644	50	Econocem	3#/sk KolSeal
INTERMEDIATE	Tail		0	5022	536	1.33	14.8	714	50	Halcem	none
PRODUCTION	Lead		4000	1932 2	425	3.48	10.5	1482	10	NeoCem	2#/sk Kol Seal
PRODUCTION	Tail		4000	1932 2	1941	1.22	14.5	2374	10	Versacem	None

## **Section 5 - Circulating Medium**

Mud System Type: Closed

Will an air or gas system be Used? NO

Description of the equipment for the circulating system in accordance with Onshore Order #2:

Diagram of the equipment for the circulating system in accordance with Onshore Order #2:

**Describe what will be on location to control well or mitigate other conditions:** Sufficient mud materials to maintain mud properties and meet minimum lost circulation and weight increase requirements will be kept on location at all time.

Describe the mud monitoring system utilized: PVT/Pason/Visual Monitoring

## **Circulating Medium Table**

Top Depth	Bottom Depth	Mud Type	Min Weight (lbs/gal)	Max Weight (lbs/gal)	Density (lbs/cu ft)	Gel Strength (lbs/100 sqft)	HA	Viscosity (CP)	Salinity (ppm)	Filtration (cc)	Additional Characteristics
5022	1047 2	OIL-BASED MUD	8.7	8.9							
1400	5022	OTHER : Diesel- Brine Emulsion	8.7	8.9							
0	1400	OTHER : Fresh Water	8.4	9							

Well Name: BELL LAKE UNIT NORTH Well Number: 203H

#### **Section 6 - Test, Logging, Coring**

List of production tests including testing procedures, equipment and safety measures:

Top of cement on production casing will be determined by calculation.

List of open and cased hole logs run in the well:

DIRECTIONAL SURVEY, GAMMA RAY LOG, MUD LOG/GEOLOGIC LITHOLOGY LOG, MUD LOG/GEOLOGICAL LITHOLOGY LOG.

Coring operation description for the well:

None planned

#### Section 7 - Pressure

Anticipated Bottom Hole Pressure: 4846 Anticipated Surface Pressure: 2542

Anticipated Bottom Hole Temperature(F): 165

Anticipated abnormal pressures, temperatures, or potential geologic hazards? NO

Describe:

**Contingency Plans geoharzards description:** 

Contingency Plans geohazards attachment:

Hydrogen Sulfide drilling operations plan required? YES

Hydrogen sulfide drilling operations plan:

H2S\_Contingency\_Plan\_NM\_BLUN\_20190926073105.pdf

#### **Section 8 - Other Information**

Proposed horizontal/directional/multi-lateral plan submission:

BELL\_LAKE\_UNIT\_NORTH\_203H\_\_\_Directional\_Plan\_20200114081212.pdf

Other proposed operations facets description:

Gas Capture Plan attached

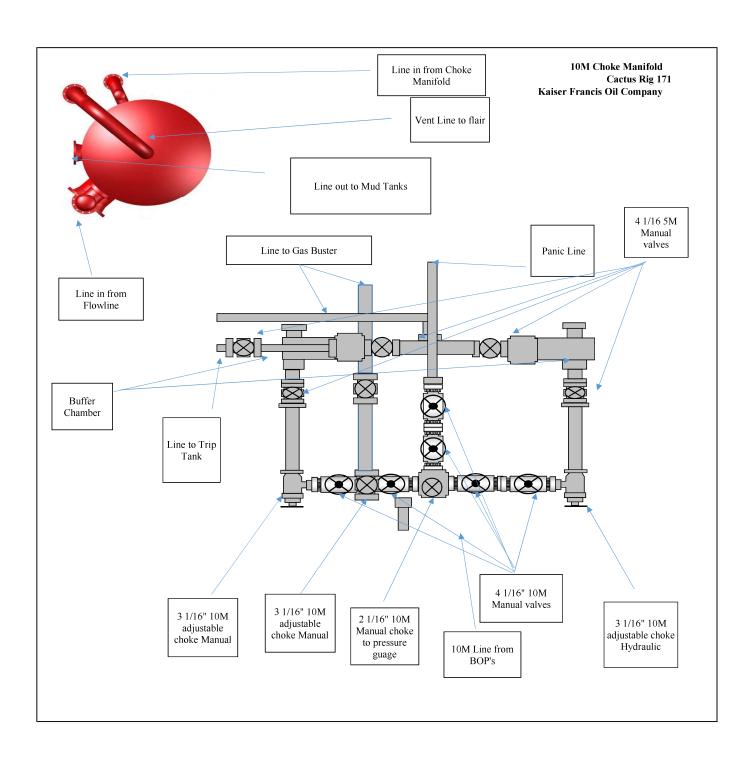
Other proposed operations facets attachment:

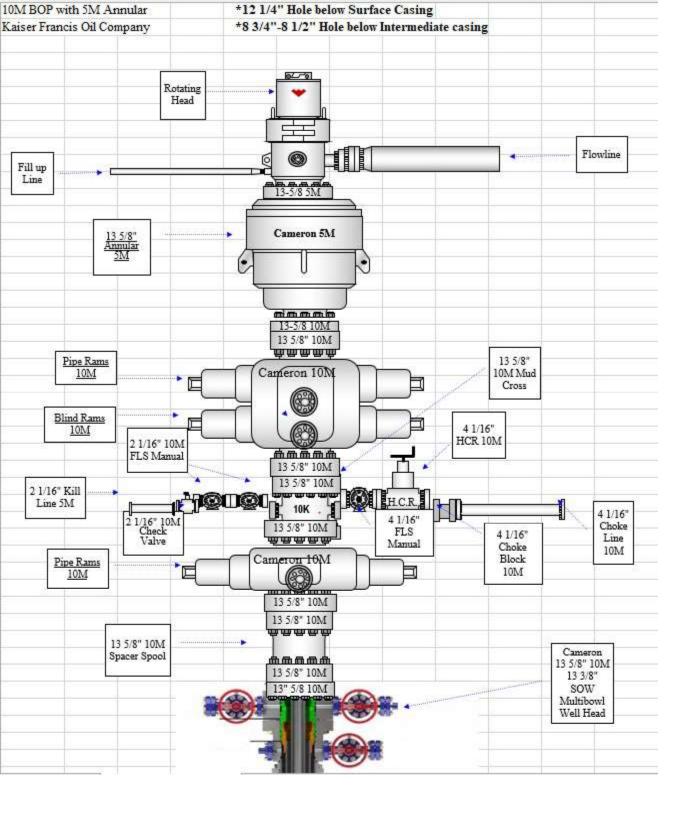
Gas Capture Plan BLUN Pad 2 20200114081606.pdf

Other Variance attachment:

Cactus\_Flex\_Hose\_16C\_Certification\_20200114081305.pdf Annular\_BOP\_Variance\_Request\_20200827132555.pdf







## KFOC Well Control Plan

#### A. Component and Preventer Compatibility Table

Component	OD	Preventer	RWP
Drill Pipe	4 1/2"	Upper VBR: 3.5 – 5.5 Lower VBR: 3.5 – 5.5	10M
Heavyweight Drill Pipe	4 1/2"	Upper VBR: 3.5 – 5.5 Lower VBR: 3.5 – 5.5	10M
Drill Collars & MWD Tools	6 1/4"-4 3/4"	Annular Upper VBR: 3.5 – 5.5 Lower VBR: 3.5 – 5.5	5M 10M 10M
Mud Motor	8"-4 3/4"	Annular Upper VBR: 3.5 – 5.5 Lower VBR: 3.5 – 5.5	5M 10M 10M
Production Casing	5 1/2"	Upper VBR: 3.5 – 5.5 Lower VBR: 3.5 – 5.5	10M
All	0 – 13 5/8"	Annular	5M
Open Hole		Blind Rams	10M

#### **B. Well Control Procedures**

#### I. <u>General Procedures While Drilling</u>:

- a. Sound alarm alert crew
- b. Space out drill string
- c. Shut down pumps and stop rotary
- d. Open HCR
- e. Shut well in, utilizing upper VBRs
- f. Close choke
- g. Confirm shut in
- h. Notify rig manager and KFOC, Inc. company representative
- i. Call KFOC, Inc. engineer
- j. Read and record:
  - i. Shut in drill pressure and shut in casing pressure
  - ii. Pit gain
  - iii. Time
- k. Regroup, identify forward plan

#### II. General Procedures While Tripping:

- a. Sound alarm alert crew
- b. Stab full opening safety valve and close
- c. Space out drill string
- d. Open HCR
- e. Shut well in, utilizing upper VBRs
- f. Close choke
- g. Confirm shut in
- h. Notify rig manager and KFOC. company representative
- i. Call KFOC. engineer

### KFOC Well Control Plan

- j. Read and record:
  - i. Shut in drill pressure and shut in casing pressure
  - ii. Pit gain
  - iii. Time
- k. Regroup, identify forward plan

#### III. General Procedures While Running Casing:

- a. Sound alarm alert crew
- b. Stab full opening safety valve and close
- c. Space out drill string
- d. Open HCR
- e. Shut well in, utilizing upper VBRs
- f. Close choke
- g. Confirm shut in
- h. Notify rig manager and KFOC company representative
- i. Call KFOC engineer
- j. Read and record:
  - i. Shut in drill pressure and shut in casing pressure
  - ii. Pit gain
  - iii. Time
- k. Regroup, identify forward plan

#### IV. General Procedures With No Pipe in Hole (Open Hole):

- a. Sound alarm alert crew
- b. Open HCR
- c. Shut well in with blind rams
- d. Close choke
- e. Confirm shut in
- f. Notify rig manager and KFOC company representative
- g. Call KFOC engineer
- h. Read and record:
- i. Shut in drill pressure and shut in casing pressure
  - ii. Pit gain
  - iii. Time
- j. Regroup, identify forward plan

#### V. <u>General Procedures While Pulling BHL Through BOP Stack:</u>

1. Prior to pulling last joint of drill pipe through stack A.

Perform flow check and if flowing:

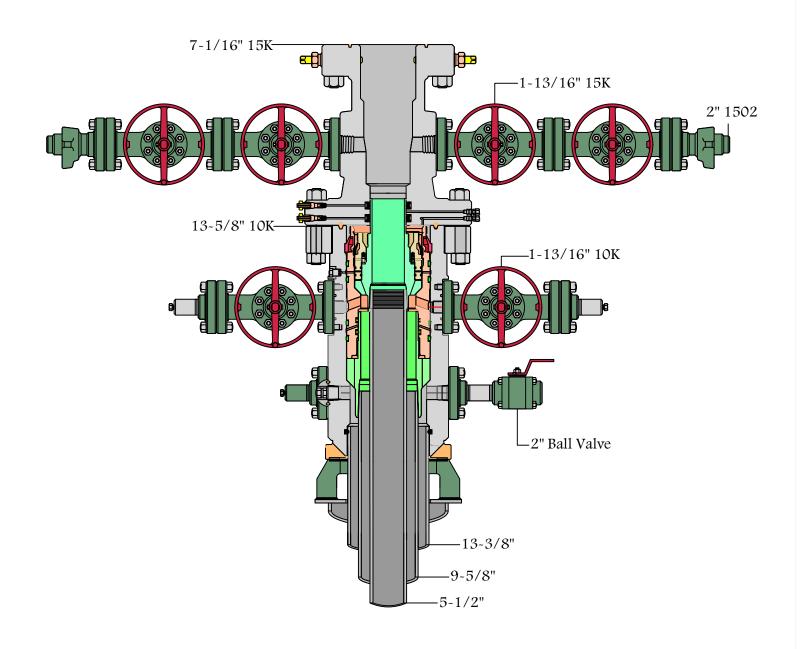
- a. Sound alarm alert crew
- b. Stab full opening safety valve and close
- c. Space out drill string with tool joint just beneath upper pipe ram
- d. Open HCR
- e. Shut well in utilizing upper VBRs
- f. Close choke
- g. Confirm shut in
- h. Notify rig manager and KFOC company representative
- i. Call KFOC engineer

### KFOC Well Control Plan

- j. Read and record:
  - i. Shut in drill pressure and shut in casing pressure
  - ii. Pit gain
  - iii. Time
- k. Regroup, identify forward plan
- 2. With BHL in the BOP stack and compatible ram preventer and pipe combo immediately available.
  - a. Sound alarm alert crew
  - b. Stab full opening safety valve and close
  - c. Space out drill string with tool joint just beneath upper pipe ram
  - d. Open HCR
  - e. Shut well in utilizing upper VBRs
  - f. Close choke
  - g. Confirm shut in
  - h. Notify rig manager and KFOC. company representative
  - i. Call KFOC engineer
  - j. Read and record:
    - i. Shut in drill pressure and shut in casing pressure
    - ii. Pit gain
    - iii. Time
  - k. Regroup, identify forward plan
- 3. With BHA in the BOP stack and no compatible ram preventer and pipe combo immediately available
  - a. Sound alarm alert crew
  - b. If possible to pick up high enough, pull string clear of the stack and follow Open Hole scenario (III)
  - c. If impossible to pick up high enough to pull the string clear of the stack:
    - i. Stab crossover, make up one joint/stand of drill pipe and full opening safety valve and close
    - ii. Space out drill string with tool joint just beneath the upper pipe ram
    - iii. Open HCR
    - iv. Shut in utilizing upper VBRs
    - v. Close choke
    - vi. Confirm shut in
    - vii. Notify rig manager and Mesquite SWD, Inc. company representative
    - viii. Read and record:
      - 1. Shut in drill pipe pressure and shut in casing pressure
      - 2. Pit gain
      - 3. Time
  - d. Regroup and identify forward plan

<sup>\*\*</sup> If annular is used to shut in well and pressure build to or is expected to get to 50% of RWP, confirm space-out and swap to upper VBRs for shut in.

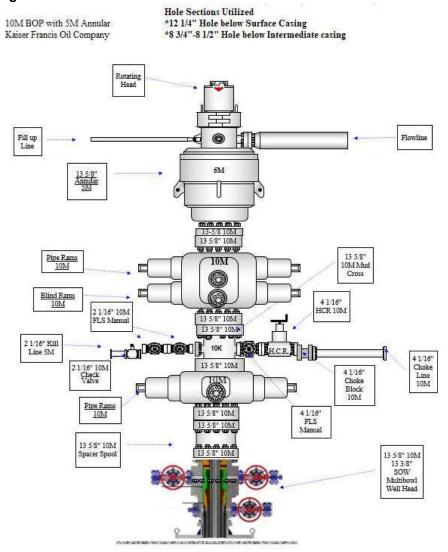




**RKI** 

Kaiser Francis Oil Co. request a variance to use a 5K psi annular BOP with a 10K BOP stack. Attached are Kaiser Francis Oil Co. minimum processes required to assure a proper shut-in while drilling, tripping, open hole, and moving BHA through the BOPs. A minimum of one well control drill will be performed weekly per tour, to regulate compliance with well control procedures and plans. Drills will be determined by operations, and will variate on drills conducted. Drills will consist of but are not limited to pit, trip, open hole, and choke drills. This well control plan will be available for review to all rig personnel. A copy of well control plan will be located in the Kaiser Francis Oil Co. representative's office on location, and on the rig floor during drilling operations. All BOP equipment will be tested per Onshore O&G Order No. 2 with the exception of the 5K annular which will be tested to 70% of it rated working pressure.

#### A. BOP Diagram



#### **B.** Component and Preventer Compatibility Table

Component	OD	Preventer	RWP
Drill Pipe	4 1/2"	Upper VBR: 3.5 – 5.5 Lower VBR: 3.5 – 5.5	10M
Heavyweight Drill Pipe	4 1/2"	Upper VBR: 3.5 – 5.5 Lower VBR: 3.5 – 5.5	10M
Drill Collars & MWD Tools	6 1/4"-4 ¾"	Annular Upper VBR: 3.5 – 5.5 Lower VBR: 3.5 – 5.5	5M 10M 10M
Mud Motor	8"-4 3/4"	Annular Upper VBR: 3.5 – 5.5 Lower VBR: 3.5 – 5.5	5M 10M 10M
Production Casing	5 1/2"	Upper VBR: 3.5 – 5.5 Lower VBR: 3.5 – 5.5	10M
Surface Casing	10-3/4"	Annular	5M
Intermediate Casing	7-5/8	Annular	5M
All	0 – 13 5/8"	Annular	5M
Open Hole		Blind Rams	10M

#### C. Well Control Procedures

- I. <u>General Procedures While Drilling:</u>
  - a. Sound alarm alert crew
  - b. Space out drill string
  - c. Shut down pumps and stop rotary
  - d. Open HCR
  - e. Shut well in, utilizing upper VBRs
  - f. Close choke
  - g. Confirm shut in
  - h. Notify rig manager and KFOC, Inc. company representative
  - i. Call KFOC, Inc. engineer
  - j. Read and record:
    - i. Shut in drill pressure and shut in casing pressure
    - ii. Pit gain
    - iii. Time
  - k. Regroup, identify forward plan

#### II. <u>General Procedures While Tripping</u>:

- a. Sound alarm alert crew
- b. Stab full opening safety valve and close
- c. Space out drill string
- d. Open HCR

- e. Shut well in, utilizing upper VBRs
- f. Close choke
- g. Confirm shut in
- h. Notify rig manager and KFOC. company representative
- i. Call KFOC. engineer
- j. Read and record:
  - i. Shut in drill pressure and shut in casing pressure
  - ii. Pit gain
  - iii. Time
- k. Regroup, identify forward plan

#### III. General Procedures While Running Casing:

- a. Sound alarm alert crew
- b. Stab full opening safety valve and close
- c. Space out drill string
- d. Open HCR
- e. Shut well in, utilizing upper VBRs
- f. Close choke
- g. Confirm shut in
- h. Notify rig manager and KFOC company representative
- i. Call KFOC engineer
- i. Read and record:
  - i. Shut in drill pressure and shut in casing pressure
  - ii. Pit gain
  - iii. Time
- k. Regroup, identify forward plan

#### IV. General Procedures With No Pipe in Hole (Open Hole):

- a. Sound alarm alert crew
- b. Open HCR
- c. Shut well in with blind rams
- d. Close choke
- e. Confirm shut in
- f. Notify rig manager and KFOC company representative
- g. Call KFOC engineer
- h. Read and record:
- i. Shut in drill pressure and shut in casing pressure
  - ii. Pit gain
  - iii. Time
- j. Regroup, identify forward plan

#### V. General Procedures While Pulling BHA Through BOP Stack:

1. Prior to pulling last joint of drill pipe through stack A.

Perform flow check and if flowing:

- a. Sound alarm alert crew
- b. Stab full opening safety valve and close
- c. Space out drill string with tool joint just beneath upper pipe ram

- d. Open HCR
- e. Shut well in utilizing upper VBRs
- f. Close choke
- g. Confirm shut in
- h. Notify rig manager and KFOC company representative
- i. Call KFOC engineer
- j. Read and record:
  - i. Shut in drill pressure and shut in casing pressure
  - ii. Pit gain
  - iii. Time
- k. Regroup, identify forward plan
- 2. With BHA in the BOP stack and compatible ram preventer and pipe combo immediately available.
  - a. Sound alarm alert crew
  - b. Stab full opening safety valve and close
  - c. Space out drill string with tool joint just beneath upper pipe ram
  - d. Open HCR
  - e. Shut well in utilizing upper VBRs
  - f. Close choke
  - g. Confirm shut in
  - h. Notify rig manager and KFOC. company representative
  - i. Call KFOC engineer
  - j. Read and record:
    - i. Shut in drill pressure and shut in casing pressure
    - ii. Pit gain
    - iii. Time
  - k. Regroup, identify forward plan
- 3. With BHA in the BOP stack and no compatible ram preventer and pipe combo immediately available
  - a. Sound alarm alert crew
  - b. If possible to pick up high enough, pull string clear of the stack and follow Open Hole scenario (III)
  - c. If impossible to pick up high enough to pull the string clear of the stack:
    - Stab crossover, make up one joint/stand of drill pipe and full opening safety valve and close
    - ii. Space out drill string with tool joint just beneath the upper pipe ram
    - iii. Open HCR
    - iv. Shut in utilizing upper VBRs
    - v. Close choke
    - vi. Confirm shut in
    - vii. Notify rig manager and Mesquite SWD, Inc. company representative
    - viii. Read and record:
      - 1. Shut in drill pipe pressure and shut in casing pressure
      - 2. Pit gain
      - 3. Time

## d. Regroup and identify forward plan

<sup>\*\*</sup> If annular is used to shut in well and pressure build to or is expected to get to 50% of RWP, confirm space-out and swap to upper VBRs for shut in.

#### BLUN 203H

#### **Casing Assumptions**

Interval	Length	Casing Size	Weight (#/ft)		Thread	Condition	Hole Size	TVD (ft)	Mud Type	Mud Weight Hole Control	Viscosity	Fluid Loss		Pressure	Collapse (psi)	Burst (psi)	Body Tensile Strength	Joint Tensile Strength	Safety Factor	Factor	Safety Factor	Joint Tensile Safety Factor
Conductor	120'	20"				New		120					(ppg)	(psi)	,		,		(Min 1.1)	(Min 1.0)	(Min 1.8)	(Min 1.8)
Surface	1400	13-3/8"	54.5	J-55	BTC	New	17-1/2"	1400	FW	8.4 - 9.0	32 - 34	NC	9	595	1130	2730	853000	909000	1.9	4.6	12.3	13.1
Intermediate	5022	9-5/8"	40	HCP-110	LTC	New	12-1/4"	5022	DBE	8.7-8.9	28	NC	8.9	2324	4230	7900	1260000	1266000	1.8	3.4	6.3	6.3
Production	19322	5-1/2"	20	P110	GBCD	New	8-3/4"	10472	OBM	8.7 - 8.9	28-29	NC	8.9	4846	11100	12640	641000	667000	2.3	2.6	3.1	3.2



#### **GB Connection Performance Properties Sheet**

Rev. 3 (08/25/2015)

#### ENGINEERING THE RIGHT CONNECTIONS $^{\mathsf{TM}}$

Casing:5.5 OD, 20 ppfConnection:GB CD Butt 6.050Casing Grade:P-110Coupling Grade:API P-110

		PIPE BODY GEOM	IETRY		
Nominal OD (in.)	5 1/2	Wall Thickness (in.)	0.361	Drift Diameter (in.)	4.653
Nominal Weight (ppf)	20.00	Nominal ID (in.)	4.778	API Alternate Drift Dia. (in.)	N/A
Plain End Weight (ppf)	19.83	Plain End Area (in.2)	5.828		

		PIPE BODY PERFOR	MANCE					
Material Specification	P-110	Min. Yield Str. (psi)	110,000	Min. Ultimate Str. (psi)	125,000			
Collapse		Tension		Pressure				
API (psi)	11,100	Pl. End Yield Str. (kips)	641	Min. Int. Yield Press. (psi)	12,640			
High Collapse (psi)	N/A	Torque		Bending				
		Yield Torque (ft-lbs)	74,420	Build Rate to Yield (°/100 ft)	91.7			

ı			GB CD Butt 6.050 COUPLIN	IG GEOMETRY
	Coupling OD (in.)	6.050	Makeup Loss (in.)	4.2500
	Coupling Length (in.)	8.500	Critical Cross-Sect. (in.2)	6.102

	GB CD Butt	6.050 CONNECTION PERFORM	ANCE RATINGS,	/EFFICIENCIES			
Material Specification	API P-110	Min. Yield Str. (psi)	110,000	Min. Ultimate Str. (psi)	125,000		
Tension		Efficiency		Bending			
Thread Str. (kips)	667	Internal Pressure (%)	98%	Build Rate to Yield (°/100 ft)	83.3		
Min. Tension Yield (kips)	638	External Pressure (%)	100%	Yield Torque			
Min. Tension Ult. (kips)	725	Tension (%)	100%	Yield Torque (ft-lbs)	31,180		
Joint Str. (kips)	667	Compression (%)	100%				
		Ratio of Areas (Cplg/Pipe)	1.05				

		MAKEUP TORQ	UE		
Min. MU Tq. (ft-lbs)	10,000	Max. MU Tq. (ft-lbs)	20,000	Running Tq. (ft-lbs)	See GBT RP
				Max. Operating Tq. (ft-lbs)*	29.620

Units: US Customary (lbm, in., °F, lbf)

1 kip = 1,000 lbs

See attached: Notes for GB Connection Performance Properties.

GBT Running Procedure (GBT RP): www.gbtubulars.com/pdf/RP-GB-DWC-Connections.pdf Blanking Dimensions: www.gbtubulars.com/pdf/GB-DWC-Blanking-Dimensions.pdf Connection yield torque rating based on physical testing or extrapolation therefrom

<sup>\*</sup> See Running Procedure for description and limitations.

#### BLUN 203H

#### **Casing Assumptions**

Interval	Length	Casing Size	Weight (#/ft)		Thread	Condition	Hole Size	TVD (ft)	Mud Type	Mud Weight Hole Control	Viscosity	Fluid Loss		Pressure	Collapse (psi)	Burst (psi)	Body Tensile Strength	Joint Tensile Strength	Safety Factor	Factor	Safety Factor	Joint Tensile Safety Factor
Conductor	120'	20"				New		120					(ppg)	(psi)	,		,		(Min 1.1)	(Min 1.0)	(Min 1.8)	(Min 1.8)
Surface	1400	13-3/8"	54.5	J-55	BTC	New	17-1/2"	1400	FW	8.4 - 9.0	32 - 34	NC	9	595	1130	2730	853000	909000	1.9	4.6	12.3	13.1
Intermediate	5022	9-5/8"	40	HCP-110	LTC	New	12-1/4"	5022	DBE	8.7-8.9	28	NC	8.9	2324	4230	7900	1260000	1266000	1.8	3.4	6.3	6.3
Production	19322	5-1/2"	20	P110	GBCD	New	8-3/4"	10472	OBM	8.7 - 8.9	28-29	NC	8.9	4846	11100	12640	641000	667000	2.3	2.6	3.1	3.2

#### KAISER-FRANCIS OIL COMPANY HYDROGEN SULFIDE (H<sub>2</sub>S) CONTINGENCY PLAN FOR DRILLING/COMPLETION WORKOVER/FACILITY

Bell Lake Unit North SECTION 1 -T23S-R33E SECTION 6 -T23S-R34E SECTION 5 -T23S-R34E

LEA COUNTY, NM

This well/facility is not expected to have  $H_2S$ , but due to the sensitive location, the following is submitted as requested.

#### TABLE OF CONTENTS

Emergency Response Activation and General Responsibilities	3
Individual Responsibilities During An H₂S Release	4
Procedure For Igniting An Uncontrollable Condition	5
Emergency Phone Numbers	6
Protection Of The General Public/Roe	7
Characteristics Of H <sub>2</sub> S And SO <sub>2</sub>	8
Training	8
Public Relations	8
Maps	

#### **EMERGENCY RESPONSE ACTIVATION AND GENERAL RESPONSIBILITIES**

#### Activation of the Emergency Action Plan

In the event of any emergency situation, all personnel on location should first ensure that the following items are initiated. After that, they should refer to the appropriate Specific Emergency Guidance sections below for further responsibilities:

- 1. Notify the senior ranking contract representative on site.
- 2. Notify Kaiser-Francis representative in charge.
- 3. Notify civil authorities if the Kaiser-Francis Representative cannot be contacted and the situation dictates.
- 4. Perform rescue and first aid as required (without jeopardizing additional personnel).

#### General Responsibilities

In the event of an H<sub>2</sub>S emergency, the following plan will be initiated.

- 1) All personnel will immediately evacuate to an up-wind and if possible up-hill "safe area".
- 2) If for any reason a person must enter the hazardous area, they must wear a SCBA (Self contained breathing apparatus).
- 3) Always use the "buddy system".
- 4) Isolate the well/problem if possible.
- 5) Account for all personnel
- 6) Display the proper colors, warning all unsuspecting personnel of the danger at hand
- 7) Contact the Company personnel as soon as possible if not at the location. (use the enclosed call list as instructed)

At this point the company representative will evaluate the situation and coordinate the necessary duties to bring the situation under control, and if necessary, the notification of emergency response agencies and residents.

#### INDIVIDUAL RESPONSIBILITIES DURING AN H2S RELEASE

The following procedures and responsibilities will be implemented on activation of the H<sub>2</sub>S siren and lights.

## All Personnel:

On alarm, don escape unit (if available) and report to upwind briefing area.

#### Rig Manager/Tool Pusher:

- 1. Check that all personnel are accounted for and their condition.
- 2. Administer or arrange for first aid treatment, and/or call EMTs as needed.
- 3. Identify two people best suited to secure well and perform rescue, and instruct them to don SCBA.
- Notify Contract management and Kaiser-Francis Representative.
- 5. Remain at the briefing area, assess and monitor personnel and overall situation for hazards or conditions that might warrant a change in the action plan.

#### Two People Responsible for Shut-in and Rescue:

- 1. Don SCBA and acquire tools to secure well and perform rescue, i.e., wrenches, retrieval ropes, etc.
- 2. Utilize the buddy system to secure well and perform rescue(s).
- 3. Return to the briefing area and stand by for further instructions.

#### All Other Personnel:

1. Isolate the area and prevent entry by other persons into the 100 ppm ROE.

Additionally the first responder(s) must evacuate any public places encompassed by the 100 ppm ROE. First responder(s) must take care not to injure themselves during this operation. Company and/or local officials must be contacted to aid in this operation. Evacuation of the public should be beyond the 100 ppm ROE.

#### Kaiser-Francis Oil Company Representative:

- 1. Remain at the briefing area, assess and monitor personnel and overall situation for hazards or conditions that might warrant a change in the action plan.
- 2. Notify company management or Local Incident Commander, and Police, Fire Department, or other local emergency services as required.

#### PROCEDURE FOR IGNITING AN UNCONTROLLABLE CONDITION:

Should control of the well be considered lost and ignition considered, take care to protect against exposure to Sulfur Dioxide (SO<sub>2</sub>). Intentional ignition must be coordinated with the NMOCD and local officials. Additionally the NM State Police shall be the Incident Command of any major release.

The decision to ignite a well should be a last resort and one if not both of the following pertain.

- 1) Human life and/or property are in danger.
- 2) There is no hope of bringing the situation under control with the prevailing conditions at the site.

#### **INSTRUCTIONS FOR IGNITION:**

- 1) Two people are required. They must be equipped with positive pressure; self contained breathing apparatus and a "D"-ring style, full body, OSHA approved safety harness. Non-flammable rope will be attached.
- 2) One of the people will be a qualified safety person who will test the atmosphere for H<sub>2</sub>S, Oxygen, & LFL. The other person will be the company supervisor; he is responsible for igniting the well.
- 3) Ignite up-wind from a distance no closer than necessary. Make sure that where you ignite from has the maximum escape avenue available. A 25mm flare gun shall be used, with a +/-500' range to ignite the gas.
- 4) Prior to ignition, make a final check for combustible gases.
- 5) Following ignition, continue with the emergency actions & procedures as before.

#### **CONTACTING AUTHORITIES**

Kaiser-Francis personnel must liaison with local and state agencies to ensure a proper response to a major release. Additionally, the OCD must be notified of the release as soon as possible but no later than 4 hours. Agencies will ask for information such as type and volume of release, wind direction, location of release, etc. Be prepared with all information available. The following call list of essential and potential responders has been prepared for use during a release. This response plan must be in coordination with the State of New Mexico's 'Hazardous Materials Emergency Response Plan' (HMER).

## EMERGENCY CALL LIST: (Start and continue until ONE of these people have been reached)

Kaiser-Francis Oil Co.	<u>OFFCE</u> 918/494-0000	<u>MOBILE</u>
Bill Wilkinson	580/668-2335	580/221-4637
David Zerger	918/491-4350	918/557-6708
Charles Lock	918/491-4337	918/671-6510
Stuart Blake	918/491-4347	918/510-4126
Robert Sanford	918/491-4201	918/770-2682
Eric Hansen	918/491-4339	918/527-5260

## EMERGENCY RESPONSE NUMBERS: Lea County, New Mexico

State Police – Artesia	575/748-9718
State Police – Hobbs	575/392-5580
State Police – Carlsbad	575/885-3138
Lea County Sheriff - Lovington	575/396-3611
Local Emergency Planning Center – Lea County	575/396-8607
Local Emergency Planning Center – Eddy County	575/885-3581
Fire Fighting, Rescue & Ambulance – Carlsbad	911 or 575/885-3125
Fire Fighting, Rescue & Ambulance – Hobbs	911 or 575/397-9308
Fire Fighting – Jal Volunteer Fire Department	911 or 505/395-2221
New Mexico Oil & Gas Commission – Artesia	575/748-1283
New Mexico Oil & Gas Commission – Hobbs	575/393-6161
Air Medical Transport Services – Hobbs	800/550-1025
Med Flight Air Ambulance – Albuquerque	505/842-4433
Angel MedFlight	844/553-9033
DXP	432/580-3770
BJ Services	575/392-5556
Halliburton	575/392-6531 800/844-8451

#### PROTECTION OF THE GENERAL PUBLIC/ROE:

In the event of a release with a concentration greater than 100 ppm H<sub>2</sub>S, the ROE (Radius of Exposure) calculations will be done to determine if the following conditions have been met:

- Does the 100 ppm ROE include any public area (any place not associated with this site)
- Does the 500 ppm ROE include any public road (any road which the general public may travel)
- Is the 100 ppm ROE equal to or greater than 3000 feet

If any one of these conditions have been met then the Contingency Plan will be implemented. The following shows how to calculate the radius of exposure and an example.

#### Calculation for the 100 ppm ROE:

X = [(1.589)(concentration)(Q)] (0.6258)

(H2S concentrations in decimal form)

10,000 ppm +=1.+ 1,000 ppm +=.1+

100 ppm += 01+

10 ppm += .001+

## Calculation for the 500 ppm ROE:

X+[(0.4546)(concentration)(Q)] (.06258)

EXAMPLE: If a well/facility has been determined to have 150 ppm H<sub>2</sub>S in the gas mixture and the well/facility is producing at a gas rate of 200 MCFPD then:

ROE for 100 PPM X=[(1.589)(.0150)(200)] (0.6258)

X=2.65'

ROE for 500 PPM X=[(.4546)(.0150)(200)] (0.6258)

X=1.2'

(These calculations will be forwarded to the appropriate District NMOCD office when applicable.)

#### PUBLIC EVACUATION PLAN:

(When the supervisor has determined that the General Public will be involved, the following plan will be implemented)

- 1) Notification of the emergency response agencies of the hazardous condition and Implement evacuation procedures.
- 2) A trained person in H<sub>2</sub>S safety, shall monitor with detection equipment the H<sub>2</sub>S Concentration, wind and area of exposure (ROE). This person will determine the outer perimeter of the hazardous area. The extent of the evacuation area will be determined from the data being collected. Monitoring shall continue until the situation has been resolved. (All monitoring equipment will be UL approved, for use in class I groups A,B,C & D, Division I, hazardous locations. All monitors will have a minimum capability of measuring H<sub>2</sub>S, oxygen, and flammable values.)
- 3) Law enforcement shall be notified to set up necessary barriers and maintain such for the duration of the situation as well as aid in the evacuation procedure.
- 4) The company supervising personnel shall stay in communication with all agencies through out the duration of the situation and inform such agencies when the situation has been contained and the effected area(s) is safe to enter.

#### CHARACTERISTICS OF H2S AND SO2

Common	Chemical	Specific	Threshold	Hazardous	Lethal
Name	Formula	Gravity	Limit	Limit	Concentration
Hydrogen		1.189			
Sulfide	H <sub>2</sub> S	Air = 1	10 ppm	100 ppm	600 ppm
		2.21			
Sulfur Dioxide	SO <sub>2</sub>	Air = 1	2 ppm	N/A	1000 ppm

#### TRAINING:

All responders must have training in the detection of  $H_2S$  measures for protection against the gas, equipment used for protection and emergency response. Weekly drills by all crews will be conducted and recorded in the IADC daily log. Additionally, responders must be equipped with  $H_2S$  monitors at all times.

#### **PUBLIC RELATIONS**

Kaiser-Francis recognizes that the news media have a legitimate interest in incidents at Kaiser-Francis facilities that could affect the public. It is to the company's benefit to cooperate with the news media when incidents occur because these media are our best liaison with the public.

Our objective is to see that all reports of any emergency are factual and represent the company's position fairly and accurately. Cooperation with news media representatives is the most reliable guarantee that this objective will be met.

All contract and Kaiser-Francis employees are instructed **NOT** to make any statement to the media concerning the emergency incident. If a media representative contacts any employee, they should refer them to the designated Emergency Command Center where they should contact the Incident Commander or his designated relief for any information concerning the incident.



# **Kaiser Francis**

Bell Lake Unit North 203H Bell Lake Unit North 203H Bell Lake Unit North 203H Bell Lake Unit North 203H

Plan: 191215 Bell Lake Unit North 203H

# **Morcor Standard Plan**

15 December, 2019



Design:

Project

Site

### **Morcor Engineering**

Morcor Standard Plan

Company: Kaiser Francis

Bell Lake Unit North 203H Project: Site: Bell Lake Unit North 203H Well: Bell Lake Unit North 203H Wellbore: Bell Lake Unit North 203H

191215 Bell Lake Unit North 203H

Bell Lake Unit North 203H

Map System: Geo Datum: Map Zone: North American Datum 1983 New Mexico Eastern Zone

US State Plane 1983

Bell Lake Unit North 203H

Site Position: Position Uncertainty:

1.0 usft

Slot Radius:

Northing: Easting:

486,800.54 usft 791,093.34 usft 17-1/2 "

Local Co-ordinate Reference:

Survey Calculation Method:

TVD Reference:

MD Reference:

Database:

North Reference:

System Datum:

Latitude: Longitude:

Grid Convergence:

Mean Sea Level

Well Bell Lake Unit North 203H

EDM 5000.1 Single User Db

Minimum Curvature

WELL @ 3540.0usft (Original Well Elev)

WELL @ 3540.0usft (Original Well Elev)

32° 20' 8.501 N 103° 31' 28.883 W 0.43 °

Bell Lake Unit North 203H Well 0.0 usft 32° 20' 8.501 N **Well Position** +N/-S Northing: 486,800.54 usft Latitude: 0.0 usft 791,093.34 usft 103° 31' 28.883 W +E/-W Easting: Longitude: Position Uncertainty 1.0 usft Wellhead Elevation: Ground Level: 3,518.0 usft

Wellbore	Bell Lake Unit Nor	· · · · · · · · · · · · · · · · · · ·							
Magnetics	Model Name	Sample Date	Declination (°)	Dip Angle (°)	Field Strength (nT)				
	IGRF2010	12/15/2019	6.52	60.08	47,837				

Design	191215 Bell Lake Unit North 203H				
Audit Notes:					
Version:	Phase:	PLAN	Tie On Depth:	0.0	
Vertical Section:	Depth From (TVD)	+N/-S	+E/-W	Direction	
	(usft)	(usft)	(usft)	(°)	
	0.0	0.0	0.0	185.97	

Survey Tool Program	Date	12/15/2019		
From	То			
(usft)	(usft)	Survey (Wellbore)	Tool Name	Description
0.0	19,322.	7 191215 Bell Lake Unit North 203H (Bell La	MWD	MWD - Standard

Morcor Standard Plan

Company: Project: Site: Kaiser Francis Bell Lake Unit North 203H Bell Lake Unit North 203H Bell Lake Unit North 203H Well: Wellbore: Bell Lake Unit North 203H Design: 191215 Bell Lake Unit North 203H Local Co-ordinate Reference:

TVD Reference: MD Reference: North Reference: Survey Calculation Method:

Database:

Well Bell Lake Unit North 203H WELL @ 3540.0usft (Original Well Elev)
WELL @ 3540.0usft (Original Well Elev)

anned Survey											
MD (usft)	Inc (°)	Azi (azimuth) (°)	TVD (usft)	TVDSS (usft)	N/S (usft)	E/W (usft)	Easting (usft)	Northing (usft)	V. Sec (usft)	DLeg (°/100usft)	
0.0	0.00	0.00	0.0	-3,540.0	0.0	0.0	791,093.34	486,800.54	0.00	0.0	
100.0	0.00	0.00	100.0	-3,440.0	0.0	0.0	791,093.34	486,800.54	0.00	0.0	
120.0	0.00	0.00	120.0	-3,420.0	0.0	0.0	791,093.34	486,800.54	0.00	0.0	
20" Conductor											
200.0	0.00	0.00	200.0	-3,340.0	0.0	0.0	791,093.34	486,800.54	0.00	0.0	
300.0	0.00	0.00	300.0	-3,240.0	0.0	0.0	791,093.34	486,800.54	0.00	0.0	
400.0	0.00	0.00	400.0	-3,140.0	0.0	0.0	791,093.34	486,800.54	0.00	0.0	
500.0	0.00	0.00	500.0	-3,040.0	0.0	0.0	791,093.34	486,800.54	0.00	0.0	
600.0	0.00	0.00	600.0	-2,940.0	0.0	0.0	791,093.34	486,800.54	0.00	0.0	
700.0	0.00	0.00	700.0	-2,840.0	0.0	0.0	791,093.34	486,800.54	0.00	0.0	
800.0	0.00	0.00	800.0	-2,740.0	0.0	0.0	791,093.34	486,800.54	0.00	0.0	
900.0	0.00	0.00	900.0	-2,640.0	0.0	0.0	791,093.34	486,800.54	0.00	0.0	
1,000.0	0.00	0.00	1,000.0	-2,540.0	0.0	0.0	791,093.34	486,800.54	0.00	0.0	
1,100.0	0.00	0.00	1,100.0	-2,440.0	0.0	0.0	791,093.34	486,800.54	0.00	0.0	
1,200.0	0.00	0.00	1,200.0	-2,340.0	0.0	0.0	791,093.34	486,800.54	0.00	0.0	
1,222.0	0.00	0.00	1,222.0	-2,318.0	0.0	0.0	791,093.34	486,800.54	0.00	0.0	
Rustler											
1,272.0	0.00	0.00	1,272.0	-2,268.0	0.0	0.0	791,093.34	486,800.54	0.00	0.0	
13 3/8" Surface	Casing										
1,300.0	0.00	0.00	1,300.0	-2,240.0	0.0	0.0	791,093.34	486,800.54	0.00	0.0	
1,400.0	0.00	0.00	1,400.0	-2,140.0	0.0	0.0	791,093.34	486,800.54	0.00	0.0	
1,472.0	0.00	0.00	1,472.0	-2,068.0	0.0	0.0	791,093.34	486,800.54	0.00	0.0	
Salado											
1,500.0	0.00	0.00	1,500.0	-2,040.0	0.0	0.0	791,093.34	486,800.54	0.00	0.0	
1,600.0	0.00	0.00	1,600.0	-1,940.0	0.0	0.0	791,093.34	486,800.54	0.00	0.0	
1,700.0	0.00	0.00	1,700.0	-1,840.0	0.0	0.0	791,093.34	486,800.54	0.00	0.0	
1,797.0	0.00	0.00	1,797.0	-1,743.0	0.0	0.0	791,093.34	486,800.54	0.00	0.0	
Top of Salt											

Morcor Standard Plan

Company: Project: Site: Kaiser Francis Bell Lake Unit North 203H Bell Lake Unit North 203H Bell Lake Unit North 203H Well: Wellbore: Bell Lake Unit North 203H Design: 191215 Bell Lake Unit North 203H Local Co-ordinate Reference:

TVD Reference: MD Reference: North Reference: Survey Calculation Method:

Database:

Well Bell Lake Unit North 203H

WELL @ 3540.0usft (Original Well Elev)
WELL @ 3540.0usft (Original Well Elev)

ned Survey										
MD (usft)	Inc (°)	Azi (azimuth) (°)	TVD (usft)	TVDSS (usft)	N/S (usft)	E/W (usft)	Easting (usft)	Northing (usft)	V. Sec (usft)	DLeg (°/100usft)
1,800.0	0.00	0.00	1,800.0	-1,740.0	0.0	0.0	791,093.34	486,800.54	0.00	0.
1,900.0	0.00	0.00	1,900.0	-1,640.0	0.0	0.0	791,093.34	486,800.54	0.00	0
2,000.0	0.00	0.00	2,000.0	-1,540.0	0.0	0.0	791,093.34	486,800.54	0.00	0
2,100.0	0.00	0.00	2,100.0	-1,440.0	0.0	0.0	791,093.34	486,800.54	0.00	0
2,200.0	0.00	0.00	2,200.0	-1,340.0	0.0	0.0	791,093.34	486,800.54	0.00	C
2,300.0	0.00	0.00	2,300.0	-1,240.0	0.0	0.0	791,093.34	486,800.54	0.00	0
2,400.0	0.00	0.00	2,400.0	-1,140.0	0.0	0.0	791,093.34	486,800.54	0.00	0
2,500.0	0.00	0.00	2,500.0	-1,040.0	0.0	0.0	791,093.34	486,800.54	0.00	0
2,600.0	0.00	0.00	2,600.0	-940.0	0.0	0.0	791,093.34	486,800.54	0.00	C
2,700.0	0.00	0.00	2,700.0	-840.0	0.0	0.0	791,093.34	486,800.54	0.00	0
2,800.0	0.00	0.00	2,800.0	-740.0	0.0	0.0	791,093.34	486,800.54	0.00	(
2,900.0	0.00	0.00	2,900.0	-640.0	0.0	0.0	791,093.34	486,800.54	0.00	(
3,000.0	0.00	0.00	3,000.0	-540.0	0.0	0.0	791,093.34	486,800.54	0.00	(
3,100.0	0.00	0.00	3,100.0	-440.0	0.0	0.0	791,093.34	486,800.54	0.00	(
3,200.0	0.00	0.00	3,200.0	-340.0	0.0	0.0	791,093.34	486,800.54	0.00	(
3,300.0	0.00	0.00	3,300.0	-240.0	0.0	0.0	791,093.34	486,800.54	0.00	(
3,400.0	0.00	0.00	3,400.0	-140.0	0.0	0.0	791,093.34	486,800.54	0.00	(
3,500.0	0.00	0.00	3,500.0	-40.0	0.0	0.0	791,093.34	486,800.54	0.00	
3,600.0	0.00	0.00	3,600.0	60.0	0.0	0.0	791,093.34	486,800.54	0.00	(
3,700.0	0.00	0.00	3,700.0	160.0	0.0	0.0	791,093.34	486,800.54	0.00	(
3,800.0	0.00	0.00	3,800.0	260.0	0.0	0.0	791,093.34	486,800.54	0.00	(
3,900.0	0.00	0.00	3,900.0	360.0	0.0	0.0	791,093.34	486,800.54	0.00	(
4,000.0	0.00	0.00	4,000.0	460.0	0.0	0.0	791,093.34	486,800.54	0.00	
4,100.0	0.00	0.00	4,100.0	560.0	0.0	0.0	791,093.34	486,800.54	0.00	(
4,200.0	0.00	0.00	4,200.0	660.0	0.0	0.0	791,093.34	486,800.54	0.00	(
4,300.0	0.00	0.00	4,300.0	760.0	0.0	0.0	791,093.34	486,800.54	0.00	
4,400.0	0.00	0.00	4,400.0	860.0	0.0	0.0	791,093.34	486,800.54	0.00	

Morcor Standard Plan

Company: Project: Site: Kaiser Francis Bell Lake Unit North 203H Bell Lake Unit North 203H Bell Lake Unit North 203H Well: Wellbore: Bell Lake Unit North 203H Design: 191215 Bell Lake Unit North 203H Local Co-ordinate Reference:

TVD Reference: MD Reference: North Reference: Survey Calculation Method:

Well Bell Lake Unit North 203H WELL @ 3540.0usft (Original Well Elev)
WELL @ 3540.0usft (Original Well Elev)

Minimum Curvature
EDM 5000.1 Single User Db

						Database:		EDM 5000.1 Single		
ned Survey										
MD (usft)	Inc (°)	Azi (azimuth) TVI		TVDSS (usft)	N/S (usft)	E/W (usft)	Easting (usft)	Northing (usft)	V. Sec (usft)	DLeg (°/100usft)
4,500.0	0.00	0.00	4,500.0	960.0	0.0	0.0	791,093.34	486,800.54	0.00	0
4,600.0	0.00	0.00	4,600.0	1,060.0	0.0	0.0	791,093.34	486,800.54	0.00	
4,700.0	0.00	0.00	4,700.0	1,160.0	0.0	0.0	791,093.34	486,800.54	0.00	
4,747.0	0.00	0.00	4,747.0	1,207.0	0.0	0.0	791,093.34	486,800.54	0.00	
Base of Salt										
4,800.0	0.00	0.00	4,800.0	1,260.0	0.0	0.0	791,093.34	486,800.54	0.00	
4,900.0	0.00	0.00	4,900.0	1,360.0	0.0	0.0	791,093.34	486,800.54	0.00	
5,000.0	0.00	0.00	5,000.0	1,460.0	0.0	0.0	791,093.34	486,800.54	0.00	
5,022.0	0.00	0.00	5,022.0	1,482.0	0.0	0.0	791,093.34	486,800.54	0.00	
Lamar - 9 5/8	8" Intermediate Casi	ing								
5,100.0	0.00	0.00	5,100.0	1,560.0	0.0	0.0	791,093.34	486,800.54	0.00	
5,200.0	0.00	0.00	5,200.0	1,660.0	0.0	0.0	791,093.34	486,800.54	0.00	
5,300.0	0.00	0.00	5,300.0	1,760.0	0.0	0.0	791,093.34	486,800.54	0.00	
5,322.0	0.00	0.00	5,322.0	1,782.0	0.0	0.0	791,093.34	486,800.54	0.00	
Bell Canyon	1									
5,400.0	0.00	0.00	5,400.0	1,860.0	0.0	0.0	791,093.34	486,800.54	0.00	
5,500.0	0.00	0.00	5,500.0	1,960.0	0.0	0.0	791,093.34	486,800.54	0.00	
5,600.0	0.00	0.00	5,600.0	2,060.0	0.0	0.0	791,093.34	486,800.54	0.00	
5,700.0	0.00	0.00	5,700.0	2,160.0	0.0	0.0	791,093.34	486,800.54	0.00	
5,800.0	0.00	0.00	5,800.0	2,260.0	0.0	0.0	791,093.34	486,800.54	0.00	
5,900.0	0.00	0.00	5,900.0	2,360.0	0.0	0.0	791,093.34	486,800.54	0.00	
6,000.0	0.00	0.00	6,000.0	2,460.0	0.0	0.0	791,093.34	486,800.54	0.00	
6,100.0	0.00	0.00	6,100.0	2,560.0	0.0	0.0	791,093.34	486,800.54	0.00	
6,200.0	0.00	0.00	6,200.0	2,660.0	0.0	0.0	791,093.34	486,800.54	0.00	
6,300.0	0.00	0.00	6,300.0	2,760.0	0.0	0.0	791,093.34	486,800.54	0.00	
6,400.0	0.00	0.00	6,400.0	2,860.0	0.0	0.0	791,093.34	486,800.54	0.00	
6,500.0	0.00	0.00	6,500.0	2,960.0	0.0	0.0	791,093.34	486,800.54	0.00	

12/15/2019 6:24:38AM Page 5 COMPASS 5000.1 Build 56

Morcor Standard Plan

Company: Project: Site: Kaiser Francis Bell Lake Unit North 203H Bell Lake Unit North 203H Bell Lake Unit North 203H Well: Wellbore: Bell Lake Unit North 203H Design: 191215 Bell Lake Unit North 203H Local Co-ordinate Reference:

Database:

TVD Reference: MD Reference: North Reference: Survey Calculation Method:

Well Bell Lake Unit North 203H WELL @ 3540.0usft (Original Well Elev)
WELL @ 3540.0usft (Original Well Elev)

Minimum Curvature EDM 5000.1 Single User Db

-										
nned Survey										
MD (usft)	Inc (°)	Azi (azimuth) (°)	TVD (usft)	TVDSS (usft)	N/S (usft)	E/W (usft)	Easting (usft)	Northing (usft)	V. Sec (usft)	DLeg (°/100usft)
6,572.0	0.00	0.00	6,572.0	3,032.0	0.0	0.0	791,093.34	486,800.54	0.00	0
Cherry Canyon										
6,600.0	0.00	0.00	6,600.0	3,060.0	0.0	0.0	791,093.34	486,800.54	0.00	C
6,700.0	0.00	0.00	6,700.0	3,160.0	0.0	0.0	791,093.34	486,800.54	0.00	(
6,800.0	0.00	0.00	6,800.0	3,260.0	0.0	0.0	791,093.34	486,800.54	0.00	C
6,900.0	0.00	0.00	6,900.0	3,360.0	0.0	0.0	791,093.34	486,800.54	0.00	C
7,000.0	0.00	0.00	7,000.0	3,460.0	0.0	0.0	791,093.34	486,800.54	0.00	(
7,100.0	0.00	0.00	7,100.0	3,560.0	0.0	0.0	791,093.34	486,800.54	0.00	(
7,200.0	0.00	0.00	7,200.0	3,660.0	0.0	0.0	791,093.34	486,800.54	0.00	(
7,300.0	0.00	0.00	7,300.0	3,760.0	0.0	0.0	791,093.34	486,800.54	0.00	(
7,400.0	0.00	0.00	7,400.0	3,860.0	0.0	0.0	791,093.34	486,800.54	0.00	(
7,500.0	0.00	0.00	7,500.0	3,960.0	0.0	0.0	791,093.34	486,800.54	0.00	(
7,600.0	0.00	0.00	7,600.0	4,060.0	0.0	0.0	791,093.34	486,800.54	0.00	(
7,700.0	0.00	0.00	7,700.0	4,160.0	0.0	0.0	791,093.34	486,800.54	0.00	(
7,800.0	0.00	0.00	7,800.0	4,260.0	0.0	0.0	791,093.34	486,800.54	0.00	
7,900.0	0.00	0.00	7,900.0	4,360.0	0.0	0.0	791,093.34	486,800.54	0.00	
8,000.0	0.00	0.00	8,000.0	4,460.0	0.0	0.0	791,093.34	486,800.54	0.00	
8,100.0	0.00	0.00	8,100.0	4,560.0	0.0	0.0	791,093.34	486,800.54	0.00	
8,200.0	0.00	0.00	8,200.0	4,660.0	0.0	0.0	791,093.34	486,800.54	0.00	(
8,222.0	0.00	0.00	8,222.0	4,682.0	0.0	0.0	791,093.34	486,800.54	0.00	(
Brushy Canyon										
8,300.0	0.00	0.00	8,300.0	4,760.0	0.0	0.0	791,093.34	486,800.54	0.00	
8,400.0	0.00	0.00	8,400.0	4,860.0	0.0	0.0	791,093.34	486,800.54	0.00	
8,447.0	0.00	0.00	8,447.0	4,907.0	0.0	0.0	791,093.34	486,800.54	0.00	
Bone Spring										
8,500.0	0.00	0.00	8,500.0	4,960.0	0.0	0.0	791,093.34	486,800.54	0.00	
8,600.0	0.00	0.00	8,600.0	5,060.0	0.0	0.0	791,093.34	486,800.54	0.00	(

12/15/2019 6:24:38AM Page 6 COMPASS 5000.1 Build 56

Morcor Standard Plan

Company: Project: Site: Kaiser Francis Bell Lake Unit North 203H Bell Lake Unit North 203H Bell Lake Unit North 203H Well: Wellbore: Bell Lake Unit North 203H 191215 Bell Lake Unit North 203H Local Co-ordinate Reference:

TVD Reference: MD Reference: North Reference: Survey Calculation Method:

Well Bell Lake Unit North 203H WELL @ 3540.0usft (Original Well Elev)
WELL @ 3540.0usft (Original Well Elev)

n: 19121	5 Bell Lake Unit I	NOILII 203H					EDM 5000.1 Single user Db			
ed Survey										
MD (usft)	Inc (°)	Azi (azimuth) (°)	TVD (usft)	TVDSS (usft)	N/S (usft)	E/W (usft)	Easting (usft)	Northing (usft)	V. Sec (usft)	DLeg (°/100usft)
8,700.0	0.00	0.00	8,700.0	5,160.0	0.0	0.0	791,093.34	486,800.54	0.00	0.0
8,800.0	0.00	0.00	8,800.0	5,260.0	0.0	0.0	791,093.34	486,800.54	0.00	0.
8,802.0	0.00	0.00	8,802.0	5,262.0	0.0	0.0	791,093.34	486,800.54	0.00	0.
Avalon										
8,900.0	0.00	0.00	8,900.0	5,360.0	0.0	0.0	791,093.34	486,800.54	0.00	0.
9,000.0	0.00	0.00	9,000.0	5,460.0	0.0	0.0	791,093.34	486,800.54	0.00	0.
9,100.0	0.00	0.00	9,100.0	5,560.0	0.0	0.0	791,093.34	486,800.54	0.00	0.
9,200.0	0.00	0.00	9,200.0	5,660.0	0.0	0.0	791,093.34	486,800.54	0.00	0.
9,300.0	0.00	0.00	9,300.0	5,760.0	0.0	0.0	791,093.34	486,800.54	0.00	0.
9,400.0	0.00	0.00	9,400.0	5,860.0	0.0	0.0	791,093.34	486,800.54	0.00	0
9,500.0	0.00	0.00	9,500.0	5,960.0	0.0	0.0	791,093.34	486,800.54	0.00	0
9,600.0	0.00	0.00	9,600.0	6,060.0	0.0	0.0	791,093.34	486,800.54	0.00	0
9,700.0	0.00	0.00	9,700.0	6,160.0	0.0	0.0	791,093.34	486,800.54	0.00	0
9,747.0	0.00	0.00	9,747.0	6,207.0	0.0	0.0	791,093.34	486,800.54	0.00	0
1st BS Sand										
9,800.0	0.00	0.00	9,800.0	6,260.0	0.0	0.0	791,093.34	486,800.54	0.00	0
9,895.0	0.00	0.00	9,895.0	6,355.0	0.0	0.0	791,093.34	486,800.54	0.00	0
Start Build 10.00										
9,900.0	0.50	249.59	9,900.0	6,360.0	0.0	0.0	791,093.32	486,800.53	0.01	10
10,000.0	10.50	249.59	9,999.4	6,459.4	-3.3	-9.0	791,084.35	486,797.19	4.26	10
10,100.0	20.50	249.59	10,095.7	6,555.7	-12.7	-34.0	791,059.33	486,787.88	16.13	10
10,200.0	30.50	249.59	10,185.8	6,645.8	-27.7	-74.3	791,019.04	486,772.89	35.23	10
10,300.0	40.50	249.59	10,267.1	6,727.1	-47.9	-128.7	790,964.68	486,752.66	61.01	10
10,306.5	41.15	249.59	10,272.0	6,732.0	-49.4	-132.6	790,960.72	486,751.18	62.89	10
2nd BS Sand										
10,400.0	50.50	249.59	10,337.1	6,797.1	-72.7	-195.4	790,897.92	486,727.81	92.67	10
10,500.0	60.50	249.59	10,393.7	6,853.7	-101.4	-272.6	790,820.78	486,699.10	129.25	10

Morcor Standard Plan

Company: Project: Site: Kaiser Francis Bell Lake Unit North 203H Bell Lake Unit North 203H Well: Bell Lake Unit North 203H Wellbore: Bell Lake Unit North 203H 191215 Bell Lake Unit North 203H Local Co-ordinate Reference:

TVD Reference: MD Reference: North Reference: Survey Calculation Method: WELL @ 3540.0usft (Original Well Elev)
WELL @ 3540.0usft (Original Well Elev)

Minimum Curvature
EDM 5000.1 Single User Db

Well Bell Lake Unit North 203H

gn: 1912	15 Bell Lake Unit	North 203H				EDM 5000.1 Single User Db				
ned Survey										
MD (usft)	Inc (°)	Azi (azimuth) (°)	TVD (usft)	TVDSS (usft)	N/S (usft)	E/W (usft)	Easting (usft)	Northing (usft)	V. Sec (usft)	DLeg (°/100usft)
10,600.0	70.50	249.59	10,435.1	6,895.1	-133.1	-357.7	790,735.61	486,667.40	169.64	10.0
10,700.0	80.50	249.59	10,460.1	6,920.1	-166.9	-448.3	790,644.99	486,633.68	212.61	10.0
10,789.6	89.46	249.59	10,467.9	6,927.9	-198.0	-531.9	790,561.40	486,602.56	252.26	10.0
Start DLS 9.22	TFO -89.80									
10,800.0	89.47	248.63	10,468.0	6,928.0	-201.7	-541.6	790,551.71	486,598.87	256.94	9.2
10,900.0	89.51	239.41	10,468.9	6,928.9	-245.4	-631.4	790,461.92	486,555.11	309.81	9.2
11,000.0	89.56	230.18	10,469.7	6,929.7	-303.0	-713.0	790,380.30	486,497.52	375.57	9.2
11,100.0	89.62	220.96	10,470.5	6,930.5	-372.9	-784.4	790,308.97	486,427.60	452.54	9.2
11,200.0	89.70	211.74	10,471.1	6,931.1	-453.4	-843.6	790,249.76	486,347.14	538.72	9.2
11,300.0	89.78	202.52	10,471.5	6,931.5	-542.3	-889.1	790,204.21	486,258.24	631.88	9.2
11,400.0	89.87	193.29	10,471.8	6,931.8	-637.4	-919.8	790,173.51	486,163.19	729.61	9.2
11,500.0	89.96	184.07	10,472.0	6,932.0	-736.1	-934.9	790,158.43	486,064.44	829.39	9.2
11,547.4	90.00	179.70	10,472.0	6,932.0	-783.5	-936.5	790,156.87	486,017.07	876.67	9.2
Start 7775.3 ho	ld at 11547.4 MD									
11,600.0	90.00	179.70	10,472.0	6,932.0	-836.1	-936.2	790,157.15	485,964.48	928.95	0.0
11,700.0	90.00	179.70	10,472.0	6,932.0	-936.1	-935.7	790,157.67	485,864.48	1,028.35	0.0
11,800.0	90.00	179.70	10,472.0	6,932.0	-1,036.1	-935.1	790,158.20	485,764.48	1,127.75	0.0
11,900.0	90.00	179.70	10,472.0	6,932.0	-1,136.1	-934.6	790,158.73	485,664.48	1,227.15	0.0
12,000.0	90.00	179.70	10,472.0	6,932.0	-1,236.1	-934.1	790,159.26	485,564.48	1,326.55	0.0
12,100.0	90.00	179.70	10,472.0	6,932.0	-1,336.1	-933.6	790,159.78	485,464.48	1,425.95	0.0
12,200.0	90.00	179.70	10,472.0	6,932.0	-1,436.1	-933.0	790,160.31	485,364.49	1,525.35	0.0
12,300.0	90.00	179.70	10,472.0	6,932.0	-1,536.1	-932.5	790,160.84	485,264.49	1,624.75	0.0
12,400.0	90.00	179.70	10,472.0	6,932.0	-1,636.1	-932.0	790,161.36	485,164.49	1,724.15	0.0
12,500.0	90.00	179.70	10,472.0	6,932.0	-1,736.1	-931.4	790,161.89	485,064.49	1,823.55	0.0
12,600.0	90.00	179.70	10,472.0	6,932.0	-1,836.0	-930.9	790,162.42	484,964.49	1,922.95	0.0
12,700.0	90.00	179.70	10,472.0	6,932.0	-1,936.0	-930.4	790,162.94	484,864.49	2,022.36	0.0
12,800.0	90.00	179.70	10,472.0	6,932.0	-2,036.0	-929.9	790,163.47	484,764.49	2,121.76	0.0

Morcor Standard Plan

Company: Project: Site: Kaiser Francis Bell Lake Unit North 203H Bell Lake Unit North 203H Bell Lake Unit North 203H Well: Wellbore: Bell Lake Unit North 203H Design: 191215 Bell Lake Unit North 203H Local Co-ordinate Reference:

TVD Reference: MD Reference: North Reference: Survey Calculation Method:

Well Bell Lake Unit North 203H WELL @ 3540.0usft (Original Well Elev)
WELL @ 3540.0usft (Original Well Elev)

ign: 191215 Bell Lake Unit North 203H					Database:	лоп метноа:	EDM 5000.1 Single User Db			
ned Survey										
MD (usft)	Inc (°)	Azi (azimuth) (°)	TVD (usft)	TVDSS (usft)	N/S (usft)	E/W (usft)	Easting (usft)	Northing (usft)	V. Sec (usft)	DLeg (°/100usft)
12,900.0	90.00	179.70	10,472.0	6,932.0	-2,136.0	-929.3	790,164.00	484,664.49	2,221.16	0.
13,000.0	90.00	179.70	10,472.0	6,932.0	-2,236.0	-928.8	790,164.53	484,564.50	2,320.56	0.
13,100.0	90.00	179.70	10,472.0	6,932.0	-2,336.0	-928.3	790,165.05	484,464.50	2,419.96	0
13,200.0	90.00	179.70	10,472.0	6,932.0	-2,436.0	-927.8	790,165.58	484,364.50	2,519.36	0
13,300.0	90.00	179.70	10,472.0	6,932.0	-2,536.0	-927.2	790,166.11	484,264.50	2,618.76	0
13,400.0	90.00	179.70	10,472.0	6,932.0	-2,636.0	-926.7	790,166.63	484,164.50	2,718.16	0
13,500.0	90.00	179.70	10,472.0	6,932.0	-2,736.0	-926.2	790,167.16	484,064.50	2,817.56	0
13,600.0	90.00	179.70	10,472.0	6,932.0	-2,836.0	-925.7	790,167.69	483,964.50	2,916.96	0
13,700.0	90.00	179.70	10,472.0	6,932.0	-2,936.0	-925.1	790,168.22	483,864.51	3,016.36	C
13,800.0	90.00	179.70	10,472.0	6,932.0	-3,036.0	-924.6	790,168.74	483,764.51	3,115.76	(
13,900.0	90.00	179.70	10,472.0	6,932.0	-3,136.0	-924.1	790,169.27	483,664.51	3,215.17	(
14,000.0	90.00	179.70	10,472.0	6,932.0	-3,236.0	-923.5	790,169.80	483,564.51	3,314.57	(
14,100.0	90.00	179.70	10,472.0	6,932.0	-3,336.0	-923.0	790,170.32	483,464.51	3,413.97	(
14,200.0	90.00	179.70	10,472.0	6,932.0	-3,436.0	-922.5	790,170.85	483,364.51	3,513.37	(
14,300.0	90.00	179.70	10,472.0	6,932.0	-3,536.0	-922.0	790,171.38	483,264.51	3,612.77	(
14,400.0	90.00	179.70	10,472.0	6,932.0	-3,636.0	-921.4	790,171.90	483,164.52	3,712.17	(
14,500.0	90.00	179.70	10,472.0	6,932.0	-3,736.0	-920.9	790,172.43	483,064.52	3,811.57	(
14,600.0	90.00	179.70	10,472.0	6,932.0	-3,836.0	-920.4	790,172.96	482,964.52	3,910.97	(
14,700.0	90.00	179.70	10,472.0	6,932.0	-3,936.0	-919.9	790,173.49	482,864.52	4,010.37	(
14,800.0	90.00	179.70	10,472.0	6,932.0	-4,036.0	-919.3	790,174.01	482,764.52	4,109.77	(
14,900.0	90.00	179.70	10,472.0	6,932.0	-4,136.0	-918.8	790,174.54	482,664.52	4,209.17	(
15,000.0	90.00	179.70	10,472.0	6,932.0	-4,236.0	-918.3	790,175.07	482,564.52	4,308.58	(
15,100.0	90.00	179.70	10,472.0	6,932.0	-4,336.0	-917.7	790,175.59	482,464.53	4,407.98	(
15,200.0	90.00	179.70	10,472.0	6,932.0	-4,436.0	-917.2	790,176.12	482,364.53	4,507.38	(
15,300.0	90.00	179.70	10,472.0	6,932.0	-4,536.0	-916.7	790,176.65	482,264.53	4,606.78	(
15,400.0	90.00	179.70	10,472.0	6,932.0	-4,636.0	-916.2	790,177.18	482,164.53	4,706.18	(
15,500.0	90.00	179.70	10,472.0	6,932.0	-4,736.0	-915.6	790,177.70	482,064.53	4,805.58	(

Morcor Standard Plan

Company: Project: Site: Kaiser Francis Bell Lake Unit North 203H Bell Lake Unit North 203H Bell Lake Unit North 203H Well: Wellbore: Bell Lake Unit North 203H 191215 Bell Lake Unit North 203H Design:

Local Co-ordinate Reference:

TVD Reference: MD Reference: North Reference: Survey Calculation Method:

Database:

Well Bell Lake Unit North 203H WELL @ 3540.0usft (Original Well Elev)
WELL @ 3540.0usft (Original Well Elev)

ned Survey										
MD (usft)	Inc (°)	Azi (azimuth) (°)	TVD (usft)	TVDSS (usft)	N/S (usft)	E/W (usft)	Easting (usft)	Northing (usft)	V. Sec (usft)	DLeg (°/100usft)
15,600.0	90.00	179.70	10,472.0	6,932.0	-4,836.0	-915.1	790,178.23	481,964.53	4,904.98	0.
15,700.0	90.00	179.70	10,472.0	6,932.0	-4,936.0	-914.6	790,178.76	481,864.53	5,004.38	0.
15,800.0	90.00	179.70	10,472.0	6,932.0	-5,036.0	-914.1	790,179.28	481,764.54	5,103.78	0.
15,900.0	90.00	179.70	10,472.0	6,932.0	-5,136.0	-913.5	790,179.81	481,664.54	5,203.18	0
16,000.0	90.00	179.70	10,472.0	6,932.0	-5,236.0	-913.0	790,180.34	481,564.54	5,302.58	0
16,100.0	90.00	179.70	10,472.0	6,932.0	-5,336.0	-912.5	790,180.86	481,464.54	5,401.98	0
16,200.0	90.00	179.70	10,472.0	6,932.0	-5,436.0	-911.9	790,181.39	481,364.54	5,501.39	0
16,300.0	90.00	179.70	10,472.0	6,932.0	-5,536.0	-911.4	790,181.92	481,264.54	5,600.79	0
16,400.0	90.00	179.70	10,472.0	6,932.0	-5,636.0	-910.9	790,182.45	481,164.54	5,700.19	0
16,500.0	90.00	179.70	10,472.0	6,932.0	-5,736.0	-910.4	790,182.97	481,064.54	5,799.59	0
16,600.0	90.00	179.70	10,472.0	6,932.0	-5,836.0	-909.8	790,183.50	480,964.55	5,898.99	C
16,700.0	90.00	179.70	10,472.0	6,932.0	-5,936.0	-909.3	790,184.03	480,864.55	5,998.39	C
16,800.0	90.00	179.70	10,472.0	6,932.0	-6,036.0	-908.8	790,184.55	480,764.55	6,097.79	C
16,900.0	90.00	179.70	10,472.0	6,932.0	-6,136.0	-908.3	790,185.08	480,664.55	6,197.19	C
17,000.0	90.00	179.70	10,472.0	6,932.0	-6,236.0	-907.7	790,185.61	480,564.55	6,296.59	(
17,100.0	90.00	179.70	10,472.0	6,932.0	-6,336.0	-907.2	790,186.14	480,464.55	6,395.99	(
17,200.0	90.00	179.70	10,472.0	6,932.0	-6,436.0	-906.7	790,186.66	480,364.55	6,495.39	C
17,300.0	90.00	179.70	10,472.0	6,932.0	-6,536.0	-906.2	790,187.19	480,264.56	6,594.79	(
17,400.0	90.00	179.70	10,472.0	6,932.0	-6,636.0	-905.6	790,187.72	480,164.56	6,694.20	(
17,500.0	90.00	179.70	10,472.0	6,932.0	-6,736.0	-905.1	790,188.24	480,064.56	6,793.60	(
17,600.0	90.00	179.70	10,472.0	6,932.0	-6,836.0	-904.6	790,188.77	479,964.56	6,893.00	(
17,700.0	90.00	179.70	10,472.0	6,932.0	-6,936.0	-904.0	790,189.30	479,864.56	6,992.40	(
17,800.0	90.00	179.70	10,472.0	6,932.0	-7,036.0	-903.5	790,189.82	479,764.56	7,091.80	(
17,900.0	90.00	179.70	10,472.0	6,932.0	-7,136.0	-903.0	790,190.35	479,664.56	7,191.20	(
18,000.0	90.00	179.70	10,472.0	6,932.0	-7,236.0	-902.5	790,190.88	479,564.57	7,290.60	(
18,100.0	90.00	179.70	10,472.0	6,932.0	-7,336.0	-901.9	790,191.41	479,464.57	7,390.00	(
18,200.0	90.00	179.70	10,472.0	6,932.0	-7,436.0	-901.4	790,191.93	479,364.57	7,489.40	0



Morcor Standard Plan

Company: Project: Site: Kaiser Francis Bell Lake Unit North 203H Bell Lake Unit North 203H Bell Lake Unit North 203H Well: Wellbore: Bell Lake Unit North 203H 191215 Bell Lake Unit North 203H Design:

Local Co-ordinate Reference:

TVD Reference: MD Reference:

Database:

WELL @ 3540.0usft (Original Well Elev)
WELL @ 3540.0usft (Original Well Elev) North Reference: Survey Calculation Method:

Well Bell Lake Unit North 203H

ned Survey										
MD (usft)	Inc (°)	Azi (azimuth) (°)	TVD (usft)	TVDSS (usft)	N/S (usft)	E/W (usft)	Easting (usft)	Northing (usft)	V. Sec (usft)	DLeg (°/100usft)
18,300.0	90.00	179.70	10,472.0	6,932.0	-7,536.0	-900.9	790,192.46	479,264.57	7,588.80	0.00
18,400.0	90.00	179.70	10,472.0	6,932.0	-7,636.0	-900.4	790,192.99	479,164.57	7,688.20	0.00
18,500.0	90.00	179.70	10,472.0	6,932.0	-7,736.0	-899.8	790,193.51	479,064.57	7,787.61	0.00
18,600.0	90.00	179.70	10,472.0	6,932.0	-7,836.0	-899.3	790,194.04	478,964.57	7,887.01	0.00
18,700.0	90.00	179.70	10,472.0	6,932.0	-7,936.0	-898.8	790,194.57	478,864.58	7,986.41	0.00
18,800.0	90.00	179.70	10,472.0	6,932.0	-8,036.0	-898.2	790,195.10	478,764.58	8,085.81	0.00
18,900.0	90.00	179.70	10,472.0	6,932.0	-8,136.0	-897.7	790,195.62	478,664.58	8,185.21	0.00
19,000.0	90.00	179.70	10,472.0	6,932.0	-8,236.0	-897.2	790,196.15	478,564.58	8,284.61	0.00
19,100.0	90.00	179.70	10,472.0	6,932.0	-8,336.0	-896.7	790,196.68	478,464.58	8,384.01	0.00
19,200.0	90.00	179.70	10,472.0	6,932.0	-8,436.0	-896.1	790,197.20	478,364.58	8,483.41	0.00
19,300.0	90.00	179.70	10,472.0	6,932.0	-8,536.0	-895.6	790,197.73	478,264.58	8,582.81	0.00
19,322.7	90.00	179.70	10,472.0	6,932.0	-8,558.6	-895.5	790,197.85	478,241.89	8,605.37	0.00
TD at 19322.7										

Casin	g Points				
	Measur Depti (usft	n Depth	Name	Casing Diameter (")	Hole Diameter (")
	1	20.0 120.	20" Conductor	20	26
	1,2	72.0 1,272.0	13 3/8" Surface Casing	13-3/8	17-1/2
	5,0	22.0 5,022.0	9 5/8" Intermediate Casing	9-5/8	12-1/4
	19,3	22.7 10,472.	5 1/2" Production Casing	5-1/2	8-3/4



Design:

### **Morcor Engineering**

Morcor Standard Plan

Company: Project: Site: Kaiser Francis Bell Lake Unit North 203H Bell Lake Unit North 203H Bell Lake Unit North 203H Well: Wellbore:

Bell Lake Unit North 203H 191215 Bell Lake Unit North 203H Local Co-ordinate Reference: TVD Reference: MD Reference: North Reference: Survey Calculation Method: Database:

Well Bell Lake Unit North 203H WELL @ 3540.0usft (Original Well Elev)
WELL @ 3540.0usft (Original Well Elev)

Formations							
	Measured Depth (usft)	Vertical Depth (usft)		Name	Lithology	Dip (°)	Dip Direction (°)
	4,747.0	4,747.0	Base of Salt			0.00	
	8,447.0	8,447.0	Bone Spring			0.00	
	8,222.0	8,222.0	Brushy Canyon			0.00	
	8,802.0	8,802.0	Avalon			0.00	
	1,222.0	1,222.0	Rustler			0.00	
	6,572.0	6,572.0	Cherry Canyon			0.00	
	1,472.0	1,472.0	Salado			0.00	
	10,306.5	10,272.0	2nd BS Sand			0.00	
	1,797.0	1,797.0	Top of Salt			0.00	
	5,022.0	5,022.0	Lamar			0.00	
	9,747.0	9,747.0	1st BS Sand			0.00	
	5,322.0	5,322.0	Bell Canyon			0.00	

Plan Annotations					
Measured		Vertical	Local Coordinates		
	Depth (usft)	Depth (usft)	+N/-S (usft)	+E/-W (usft)	Comment
	9,895.0	9,895.0	0.0	0.0	Start Build 10.00
	10,789.6	10,467.9	-198.0	-531.9	Start DLS 9.22 TFO -89.80
	11,547.4	10,472.0	-783.5	-936.5	Start 7775.3 hold at 11547.4 MD
	19,322.7	10,472.0	-8,558.6	-895.5	TD at 19322.7

Checked By:	Approved By:	Date:	

District I
1625 N. French Dr., Hobbs, NM 88240
District II
811 S. First St., Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

# State of New Mexico Energy, Minerals and Natural Resources Department

Submit Original to Appropriate District Office

Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, NM 87505

#### GAS CAPTURE PLAN

Date: 01/10/2020	
⊠ Original	Operator & OGRID No.: Kaiser-Francis Oil Company, 12361
☐ Amended - Reason for Amendment:	

This Gas Capture Plan outlines actions to be taken by the Operator to reduce well/production facility flaring/venting for new completion (new drill, recomplete to new zone, re-frac) activity.

Note: Form C-129 must be submitted and approved prior to exceeding 60 days allowed by Rule (Subsection A of 19.15.18.12 NMAC).

### Well(s)/Production Facility - Name of facility

The well(s) that will be located at the production facility are shown in the table below.

Well Name	API	Well Location (ULSTR)	Footages	Expected MCF/D	Flared or Vented	Comments
Bell Lake Unit North 203H		1-23S-33E		2000	0	
Bell Lake Unit North 204H		1-23S-33E		2000	0	
Bell Lake Unit North 303H		1-23S-33E		2000	0	
Bell Lake Unit North 304H		1-23S-33E		2000	0	
Bell Lake Unit North 403H		1-23S-33E		2000	0	
Bell Lake Unit North 404H		1-23S-33E		2000	0	

### **Gathering System and Pipeline Notification**

Well(s) will be connected to a production facility after flowback operations are complete, if gas transporter system is in place. The gas produced from production facility is dedicated to <u>Targa</u> and will be connected to <u>Targa</u> low/high pressure gathering system located in <u>Lea\_ County</u>, New Mexico. It will require <u>\_\_11,000'</u> of pipeline to connect the facility to low/high pressure gathering system. <u>Kaiser-Francis Oil Company</u> provides (periodically) to <u>Targa</u> a drilling, completion and estimated first production date for wells that are scheduled to be drilled in the foreseeable future. In addition, <u>Kaiser-Francis Oil Company</u> and <u>Targa</u> have periodic conference calls to discuss changes to drilling and completion schedules. Gas from these wells will be processed at <u>Targa</u> Processing Plant located in Sec. <u>\_\_36\_, Twn.\_\_\_198\_\_, Rng.\_\_36E, \_\_Lea\_\_</u> County, New Mexico. The actual flow of the gas will be based on compression operating parameters and gathering system pressures.

#### Flowback Strategy

After the fracture treatment/completion operations, well(s) will be produced to temporary production tanks and gas will be flared or vented. During flowback, the fluids and sand content will be monitored. When the produced fluids contain minimal sand, the wells will be turned to production facilities. Gas sales should start as soon as the wells start flowing through the production facilities, unless there are operational issues on <u>Targa</u> system at that time. Based on current information, it is <u>Kaiser-Francis Oil Company's</u> belief the system can take this gas upon completion of the well(s).

Safety requirements during cleanout operations from the use of underbalanced air cleanout systems may necessitate that sand and non-pipeline quality gas be vented and/or flared rather than sold on a temporary basis.

#### **Alternatives to Reduce Flaring**

Below are alternatives considered from a conceptual standpoint to reduce the amount of gas flared.

- Power Generation On lease
  - o Only a portion of gas is consumed operating the generator, remainder of gas will be flared
- Compressed Natural Gas On lease
  - o Gas flared would be minimal, but might be uneconomical to operate when gas volume declines
- NGL Removal On lease
  - o Plants are expensive, residue gas is still flared, and uneconomical to operate when gas volume declines