<u>District I</u> 1625 N. French Dr., Hobbs, NM 88240 <u>District II</u> 811 S. First St., Artesia, NM 88210 <u>District III</u> 1000 Rio Brazos Road, Aztec, NM 87410 <u>District IV</u> 1220 S. St. Francis Dr., Santa Fe, NM 87505	State of New Mexico Energy, Minerals and Natural Resources Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, NM 87505	Department HOBBS OCD Submit Original to Appropriate District Office SEP 0.5 2018
	GAS CAPTURE PLAN	RECEIVED
x Original	Operator & OGRID No.: <u>Devon</u>	Production Co., L.P. (6137) te: 4/13/2018

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: A C-129 must be submitted and approved prior to exceeding 60 days allowed by Rule 19.15.18.12.A

Well(s)/Production Facility – Gaucho 30 CTB 1

Well Name	API	Well Location (ULSTR)	Footages	Expected MCF/D	Flared or Vented	Comments
Gaucho Unit 37H		Sec 29-T22S-R34E	350'FSL 1973' FWL			Will connect to Gaucho 30 CTB 1
Gaucho Unit 153H		Sec 29-T22S-R34E	350'FSL 2003' FWL			Will connect to Gaucho 30 CTB 1
Gaucho Unit 152H		Sec 29-T22S-R34E	350'FSL 2033' FWL			Will connect to Gaucho 30 CTB 1
Gaucho Unit 89H	30-0	Sec 29-T22S-R34E 25-45172	350'FSL 2063' FWL			Will connect to Gaucho 30 CTB 1
Gaucho Unit 24H		Sec 29-T22S-R34E	350'FSL 2093' FWL			Will connect to Gaucho 30 CTB 1

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

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 Lucid and will be connected to Lucid's low/high pressure gathering system located in Lea County, New Mexico. It will require 0' of pipeline to connect the facility to low/high pressure gathering system. Devon provides (periodically) to Lucid a drilling, completion and estimated first production date for wells that are scheduled to be drilled in the foreseeable future. In addition, Devon and Lucid have periodic conference calls to discuss changes to drilling and completion schedules. Gas from these wells will be processed at Enterprise Processing Plant located in Sec. 36, TWN 24S, RNG 30E, Eddy 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>Lucid's</u> system at that time. Based on current information, it is <u>Devon'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
 - 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 b. amal, but might be uneconomical to operate a gas volume declines

NGL Removal – On lease ٠

• Plants are expensive, residue gas is still flared, and uneconomical to operate when gas volume declines

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