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Oil Conservation Division MAY 3 0 2019 RECEIVED

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

to Appropriate
District Office

Submit Original

GAS CAPTURE PLAN

x Original	Operator & OGRID No.: _	Devon Production Co., L.P. (6137)		
☐ Amended		Date:_	10/16/2018	
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 - Rattlesnake MDP 1 CTB 20-9

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

Well Name	API	Well Location	Footages	Expected	Flared	or	Comments
		(ULSTR)		MCF/D	Vented		
Green Wave 20-32 Fed 6H		Sec 20-T26S-R34E	2424' FSL				Will connect to Rattlesnake
70-0	29-460	148	329' FEL		1		MDP 1 CTB 20-9
Green Wave 20-32 Fed 10H		Sec 20-T26S-R34E	2424' FSL 299' FEL	i			Will connect to Rattlesnake MDP 1 CTB 20-9
Green Wave 20-32 Fed 14H		Sec 20-T26S-R34E	2424' FSL 269' FEL				Will connect to Rattlesnake MDP 1 CTB 20-9
Green Wave 20-32 Fed 18H		Sec 20-T26S-R34E	2424' FSL 359' FEL				Will connect to Rattlesnake MDP 1 CTB 20-9

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 Enterprise South Eddy and will be connected to Enterprise low/high pressure gathering system located in Eddy County, New Mexico. It will require 0' of pipeline to connect the facility to low/high pressure gathering system. Devon provides (periodically) to Enterprise a drilling, completion and estimated first production date for wells that are scheduled to be drilled in the foreseeable future. In addition, Devon and Enterprise 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 Enterprise's system at that time. Based on current information, it is Devon's 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 nonpipeline 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 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