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District III  
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State of New Mexico  
Energy, Minerals and Natural Resources Department  
Oil Conservation Division  
1220 South St. #100  
Santa Fe, NM 87505

Submit Original  
to Appropriate  
District Office

OCT 23 2019

GAS CAPTURE PLAN

RECEIVED

Date: 1/23/2019

☒ Original

Operator & OGRID No.: Devon Production Co. LP (6137)

☐ 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, recomple 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 – Blue Krait 23 CTB 2**

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

Well Name	API	Well Loc.	Footages	Exp MCF/D	Flared or Vented	Comments
Blue Krait 23-14 Fed 35H		23-24S-33E	245 FSL & 950 FWL			Connects to B.K. 23 CTB 2
Blue Krait 23-14 Fed 31H		23-24S-33E	245 FSL & 980 FWL			Connects to B.K. 23 CTB 2
Blue Krait 23-14 Fed 36H 30025-		23-24S-33E	245 FSL & 1010 FWL			Connects to B.K. 23 CTB 2
Blue Krait 23-14 Fed 32H		23-24S-33E	245 FSL & 1040 FWL			Connects to B.K. 23 CTB 2

**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 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 Energy 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 Energy and Lucid have periodic conference calls to discuss changes to drilling and completion schedules. Gas from these wells will be processed at Targa Processing Plant located in Sec. 3, Twn. 22S, Rng. 37E, Lea 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 Lucid 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 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

- Gas flared would be minimal, but might be uneconomical to operate when gas volume declines
- NGL Removal – On lease
  - Plants are expensive, residue gas is still flared, and uneconomical to operate when gas volume declines