1220 S. St. Francis Dr., Santa Fe, NM 87505 FEB 07 2020

State of New Mexico

811 S. First St., Artesia, NM 88210

District III

1000 Rio Brazos Road, Aztec, NM 8741

District IV

District IV

District IV

District IV Santa Fe, NM 87505

Submit Original to Appropriate District Office

GAS CAPTURE PLAN

x Original	Operator & OGRID No.: _	Devon Production Co., L.P. (6137)
☐ Amended		Date: 8/19/2019
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 - Billiken CTB 1

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

Well Name	API	Well Location (STR)	Footages	Expected MCF/D	Flared or Vented	Comments
Billiken 7-6 Fed Com 9H		Sec 7-T26S-R34E	294' FSL & 2161' FWL	WICITE	Vented	Will connect to Billiken CTB 1
Billiken 7-6 Fed Com 7H		Sec 7-T26S-R34E	294' FSL & 2191' FWL			Will connect to Billiken CTB 1
Billiken 7-6 Fed Com 8H	30-0	Sec 7-T26S-R34E	294' FSL & 2221' FWL			Will connect to Billiken CTB 1
	40	861				

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 Energy Transfer and will be connected to Energy Transfer low/high pressure gathering system located in Reeves Co. TX. It will require 0' of pipeline to connect the facility to low/high pressure gathering system. Devon provides (periodically) to Energy Transfer a drilling, completion and estimated first production date for wells that are scheduled to be drilled in the foreseeable future. In addition, Devon and Energy Transfer have periodic conference calls to discuss changes to drilling and completion schedules. Gas from these wells will be processed at the Red Bluff Processing Plant located in section 35 of Blk 57, T2, T&P RR Co. Reeves Co. TX. 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 Energy Transfer'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 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
 - 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