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District III  
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1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico  
Energy, Minerals and Natural Resources Department  
Oil Conservation Division  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

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to Appropriate  
District Office

FEB 20 2020

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**GAS CAPTURE PLAN**

x Original

☐ Amended

Reason for Amendment: \_\_\_\_\_

Operator & OGRID No.: Devon Production Co., L.P. (6137)

Date: 2/15/2019

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: 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 – Cobber 21 CTB 2**

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
Cobber 21-28 Fed 11H		Sec 21-T26S-R34E	213' FNL 2715' FEL			Will connect to Cobber 21 CTB 2
Cobber 21-28 Fed 5H		Sec 21-T26S-R34E	213' FNL 2685' FEL			Will connect to Cobber 21 CTB 2
Cobber 21-28 Fed 12H		Sec 21-T26S-R34E	213' FNL 2655' FEL	302026	46895	Will connect to Cobber 21 CTB 2
Cobber 21-28 Fed 6H		Sec 21-T26S-R34E	213' FNL 2625' FEL			Will connect to Cobber 21 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 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 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