State of New Mexico Energy, Minerals and Natural Resources Department

Submit Electronically Via E-permitting

Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, NM 87505

NATURAL GAS MANAGEMENT PLAN

This Natural Gas Management Plan must be submitted with each Application for Permit to Drill (APD) for a new or recompleted well.

| . Operator:Hilcorp | Energy | | OGRID | 37 | 2171 | Date | e:6_/_14_/_21_ |
|---|--------------------------------------|---------------------------------|--------------------------------|-------------------------|---------------------------|--------------------------|---------------------------------------|
| . Type: ⊠ Original □ | Amendment due | to □ 19.15.27. | 9.D(6)(a) NM | AC □ 19. | 15.27.9.D(6)(b |) NMAC □ Oth | ner. |
| f Other, please describe: | | | | | | | |
| III. Well(s): Provide the per recompleted from a single provide the recompleted from the | | | | | or set of wells | proposed to be | drilled or proposed |
| Well Name | API | ULSTR | Foota | ges | Anticipated Oil BBL/D | Anticipated Gas MCF/D | Anticipated Produced Water BBL/D |
| San Juan 28-6 Unit 155 | 30-039-20397 | L,28,28N,06W | 7 1550 FSL FWL | & 1190 | .2 | 600 | 2 |
| V. Central Delivery Po | oint Name: | Ignacio Proce | ssing Plant | | | | [Se |
| 19.15.27.9(D)(1) NMAC V. Anticipated Schedule | Provide the follo | owing informati | on for each ne | w or reco | mpleted well o | | |
| IV. Central Delivery Po 19.15.27.9(D)(1) NMAC V. Anticipated Schedule proposed to be recomplet Well Name | Provide the follo | owing informati | on for each ne | w or reco ral delive | mpleted well o | set of wells pro | oposed to be drilled First Productio |
| 19.15.27.9(D)(1) NMAC V. Anticipated Schedule proposed to be recomplet | Provide the folloged from a single w | owing informativell pad or conn | on for each ne ected to a cent | w or reco ral delive | mpleted well or ry point. | set of wells pro | oposed to be drilled First Productio |

Page 1 of 3

Section 3 - Certifications Effective May 25, 2021

Effective May 25, 2021

| Operator certifies that, a | after reasonable inquiry and based on the available information at the time of submittal: | |
|---|---|--|
| one hundred percent of | to connect the well(s) to a natural gas gathering system in the general area with sufficient capacity to transport the anticipated volume of natural gas produced from the well(s) commencing on the date of first production, current and anticipated volumes of produced natural gas from other wells connected to the pipeline gathering | |
| hundred percent of the a into account the current | able to connect to a natural gas gathering system in the general area with sufficient capacity to transport one anticipated volume of natural gas produced from the well(s) commencing on the date of first production, taking and anticipated volumes of produced natural gas from other wells connected to the pipeline gathering system. box, Operator will select one of the following: | |
| Well Shut-In. □ Opera D of 19.15.27.9 NMAC | tor will shut-in and not produce the well until it submits the certification required by Paragraph (4) of Subsection; or | |
| | lan. Operator has attached a venting and flaring plan that evaluates and selects one or more of the potential | |
| alternative beneficial us | es for the natural gas until a natural gas gathering system is available, including: | |
| (a) | power generation on lease; | |
| (b) | power generation for grid; | |
| (c) | compression on lease; | |
| (d) | liquids removal on lease; | |
| (e) | reinjection for underground storage; | |
| (f) | reinjection for temporary storage; | |
| (g) | reinjection for enhanced oil recovery; | |
| (h) | fuel cell production; and | |
| (i) | other alternative beneficial uses approved by the division | |

Section 4 - Notices

- 1. If, at any time after Operator submits this Natural Gas Management Plan and before the well is spud:
- (a) Operator becomes aware that the natural gas gathering system it planned to connect the well(s) to has become unavailable or will not have capacity to transport one hundred percent of the production from the well(s), no later than 20 days after becoming aware of such information, Operator shall submit for OCD's approval a new or revised venting and flaring plan containing the information specified in Paragraph (5) of Subsection D of 19.15.27.9 NMAC; or
- (b) Operator becomes aware that it has, cumulatively for the year, become out of compliance with its baseline natural gas capture rate or natural gas capture requirement, no later than 20 days after becoming aware of such information, Operator shall submit for OCD's approval a new or revised Natural Gas Management Plan for each well it plans to spud during the next 90 days containing the information specified in Paragraph (2) of Subsection D of 19.15.27.9 NMAC, and shall file an update for each Natural Gas Management Plan until Operator is back in compliance with its baseline natural gas capture rate or natural gas capture requirement.
- 2. OCD may deny or conditionally approve an APD if Operator does not make a certification, fails to submit an adequate venting and flaring plan which includes alternative beneficial uses for the anticipated volume of natural gas produced, or if OCD determines that Operator will not have adequate natural gas takeaway capacity at the time a well will be spud.

I certify that, after reasonable inquiry, the statements in and attached to this Natural Gas Management Plan are true and correct to the best of my knowledge and acknowledge that a false statement may be subject to civil and criminal penalties under the Oil and Gas Act.

| Signature: Kandis Roland | |
|-------------------------------------|---|
| Printed Name: Kandis Roland | |
| Title: Regulatory Tech | |
| E-mail Address: kroland@hilcorp.com | |
| Date: 6/14/2021 | |
| Phone: 505-324-5149 | |
| | OIL CONSERVATION DIVISION (Only applicable when submitted as a standalone form) |
| Approved By: | |
| Title: | |
| Approval Date: | |
| Conditions of Approval: | |
| | |
| | |
| | |
| | |

VI. Separation Equipment:

Hilcorp Energy Company (HEC or Operator) production facilities include separation equipment designed to efficiently separate gas from liquid phases to optimize gas capture based on projected and estimated volumes from the targeted pool of our recomplete project. HEC will utilize flowback separation equipment and production separation equipment designed and built to industry specifications after the recomplete to optimize gas capture and send gas to sales or flare based on analytical composition. HEC operates facilities that are typically one-well facilities. Production separation equipment is upgraded prior to well being completed, if determined to be undersized or inadequate. This equipment is already on-site and tied into our sales gas lines prior to the recomplete operations.

VII. Operational Practices:

- 1. Subsection (A) Venting and Flaring of Natural Gas
 - HEC understands the requirements of NMAC 19.15.27.8 which outlines that the venting and flaring of natural gas during drilling, completion or production operations that constitutes waste as defined in 19.15.2 are prohibited.
- 2. Subsection (B) Venting and Flaring during drilling operations
 - This gas capture plan isn't for a well being drilled.
- 3. Subsection (C) Venting and flaring during completion or recompletion
 - Flowlines will be routed for flowback fluids into a completion or storage tank and if feasible under well conditions, flare rather than vent and commence operation of a separator as soon as it is technically feasible for a separator to function.
 - At any point in the well life (completion, production, inactive) an audio, visual and olfactory inspection be performed at prescribed intervals (weekly or monthly) pursuant to Subsection D of 19.15.27.8 NMAC, to confirm that all production equipment is operating properly and there are no leaks or releases.
- 4. Subsection (D) Venting and flaring during production operations
 - At any point in the well life (completion, production, inactive) an audio, visual and olfactory inspection be performed at prescribed intervals (weekly or monthly) pursuant to Subsection D of 19.15.27.8 NMAC, to confirm that all production equipment is operating properly and there are no leaks or releases.
 - Monitor manual liquid unloading for wells on-site or in close proximity (<30 minutes' drive time), take reasonable actions to achieve a stabilized rate and pressure at the earliest practical time, and take reasonable actions to minimize venting to the maximum extent practicable.
 - HEC will not vent or flare except during the approved activities listed in NMAC 19.15.27.8 (D) 1-
- 5. Subsection (E) Performance standards
 - All tanks and separation equipment are designed for maximum throughput and pressure to minimize waste
 - If a flare is utilized during production operations it will have a continuous pilot and is located more than 100 feet from any known well or storage tanks.
 - At any point in the well life (completion, production, inactive) an audio, visual and olfactory inspection be performed at prescribed intervals (weekly or monthly) pursuant to Subsection D of 19.15.27.8 NMAC, to confirm that all production equipment is operating properly and there are no leaks or releases.

- 6. Subsection (F) Measurement or estimation of vented and flared natural gas
 - Measurement equipment is installed to measure the volume of natural gas flared from process piping.
 - When measurement isn't practicable, estimation of vented and flared natural gas will be completed as noted in 19.15.27.8 (F) 5-6.

VIII. Best Management Practices:

- 1. Operator has adequate storage and takeaway capacity for wells it chooses to recomplete as the flowlines at the sites are already in place and tied into a gathering system.
- 2. Operator will flare rather than vent vessel blowdown gas when technically feasible during active and/or planned maintenance to equipment on-site.
- 3. Operator combusts natural gas that would otherwise be vented or flared, when technically feasible.
- 4. Operator will shut in wells in the event of a takeaway disruption, emergency situation, or other operations where venting or flaring may occur due to equipment failures.

District I
1625 N. French Dr., Hobbs, NM 88240
Phone: (575) 393-6161 Fax: (575) 393-0720

District II 811 S. First St., Artesia, NM 88210 Phone:(575) 748-1283 Fax:(575) 748-9720

District III 1000 Rio Brazos Rd., Aztec, NM 87410 Phone:(505) 334-6178 Fax:(505) 334-6170

1220 S. St Francis Dr., Santa Fe, NM 87505 Phone:(505) 476-3470 Fax:(505) 476-3462

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

QUESTIONS

Action 32976

QUESTIONS

| Operator: | OGRID: |
|------------------------|-------------------------------------|
| HILCORP ENERGY COMPANY | 372171 |
| 1111 Travis Street | Action Number: |
| Houston, TX 77002 | 32976 |
| | Action Type: |
| | [UF-NGMP] NG Management Plan (NGMP) |

QUESTIONS

| II. Type: | |
|--|---------------|
| Original | True |
| Amendment due to 19.15.27.9.D(6)(a) NMAC | Not answered. |
| Amendment due to 19.15.27.9.D(6)(b) NMAC | Not answered. |
| Other | Not answered. |
| If other, please describe | Not answered. |

| III. Well(s) | |
|----------------------------------|---|
| Number of wells identified above | 1 |

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COMMENTS

| Created By | Comment | Comment Date |
|------------|-------------------------|--------------|
| kpickford | KP GEO Review 6/23/2021 | 6/23/2021 |

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CONDITIONS

| Created By | Condition | Condition Date |
|------------|-----------|----------------|
| kpickford | None | 6/23/2021 |