<u>District I</u> 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**

Form C-101 August 1, 2011

Permit 301863

APPLICATION FOR PERMIT TO	DRILL, RE-ENTER, DEEPEN, PLUGBA	ACK, OR ADD A ZONE
---------------------------	---------------------------------	--------------------

1. Operator Name and Address	2. OGRID Number						
Spur Energy Partners	328947						
9655 Katy Freeway	3. API Number						
Houston, TX 77024		30-015-49019					
4. Property Code	5. Property Name	6. Well No.					
331679	WAUKEE C 36 STATE COM	051H					

7. Surface Location

UL - Lot	Section	Township	Range	Lot Idn	Feet From	N/S Line	Feet From	E/W Line	County
L	31	17S	28E	3	2220	S	735	W	Eddy

8. Proposed Bottom Hole Location

UL - Lot	Section	Township	Range	Lot Idn	Feet From	N/S Line	Feet From	E/W Line	County
L	36	17S	27E	L	1830	S	50	W	Eddy

9. Pool Information

RED LAKE; GLORIETA-YESO, NOR	RTHEAST	96836

Additional Well Information

11. Work Type	12. Well Type	13. Cable/Rotary	14. Lease Type	15. Ground Level Elevation
New Well	OIL		State	3676
16. Multiple	17. Proposed Depth	18. Formation	19. Contractor	20. Spud Date
N	9804	Yeso		12/22/2021
Depth to Ground water		Distance from nearest fresh water well		Distance to nearest surface water

☑ We will be using a closed-loop system in lieu of lined pits

21. Proposed Casing and Cement Program

Type	Hole Size	Casing Size	Casing Weight/ft	Setting Depth	Sacks of Cement	Estimated TOC
Surf	12.25	9.625	36	1800	664	0
Prod	8.75	7	32	4350	1361	0
Prod	8.75	5.5	20	9804	1361	0

Casing/Cement Program: Additional Comments

22. Proposed Blowout Prevention Program

Туре	Working Pressure	Test Pressure	Manufacturer
Double Ram	5000	3000	Shaffer

23. I hereby certify that the information given above is true and complete to the best of my knowledge and belief. I further certify I have complied with 19.15.14.9 (A) NMAC ☒ and/or 19.15.14.9 (B) NMAC ☒, if applicable. Signature:				OIL CONSERVAT	TION DIVISION
Printed Name:	Electronically filed by Sarah Chap	man	Approved By:	Dean McClure	
Title:	Regulatory Director		Title:	Petroleum Specialist - A	
Email Address:	: schapman@spurepllc.com		Approved Date:	10/28/2021	Expiration Date: 10/28/2023
Date:	10/18/2021 Phone: 832-930-8613		Conditions of Approval Attached		

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 Road, Aztec, NM 87410 Phone: (505) 334-6178 Fax: (505) 334-6170 District IV

1220 S. St. Francis Dr., Santa Fe, NM 87505 Phone: (505) 476-3460 Fax: (505) 476-3462

State of New Mexico Energy, Minerals & Natural Resources Department OIL CONSERVATION DIVISION 1220 South St. Francis Dr. Santa Fe, NM 87505

Form C-102 Revised August 1, 2011 Submit one copy to appropriate District Office

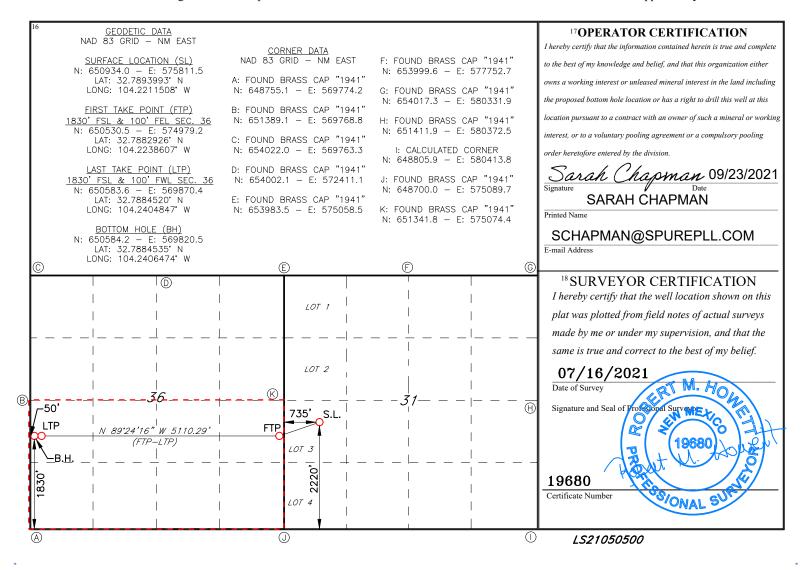
■ AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT

	WEEE ECCHTION THIS RELEASE DEDICATION LETT					
Ī	¹ API Number		² Pool Code	2 Pool Code 3 Pool Name		
	30-015-49019		96836	RED LAKE; GLORIETA-YESO, NORTHEAST		
	4Property Code		5 Pro	perty Name	6 Well Number	
	331679		WAUKEE C	36 STATE COM	51H	
	⁷ OGRID NO.		8 Op	erator Name	⁹ Elevation	
	328947		SPUR ENERGY	Y PARTNERS LLC.	3676'	

¹⁰ Surface Location UL or lot no. Lot Idn Feet from the North/South line Feet From the East/West line Section Township Range County 3 31 17S 28E 2220 SOUTH 735 WEST **EDDY** ¹¹ Bottom Hole Location If Different From Surface UL or lot no. Section Range Lot Idn Feet from the North/South line Feet from the East/West line County Township 36 17S 27E 1830 SOUTH 50 WEST **EDDY** 12 Dedicated Acres 13 Joint or Infill 14 Consolidation Code 15 Order No. 320

No allowable will be assigned to this completion until all interest have been consolidated or a non-standard unit has been approved by the division.



kpickford Cement is required to circulate on both surface and intermediate1 strings of casing

drilling fluids and solids must be contained in a steel closed loop system

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

Form APD Conditions

Permit 301863

PERMIT CONDITIONS OF APPROVAL

	lame and Address: Spur Energy Partners LLC [328947]	API Number: 30-015-49019				
	9655 Katy Freeway	Well:				
	Houston, TX 77024	WAUKEE C 36 STATE COM #051H				
OCD	Condition					
Reviewer						
kpickford	Notify OCD 24 hours prior to casing & cement					
kpickford	Will require a File As Drilled C-102 and a Directional Survey with the C-104					
kpickford	kford The Operator is to notify NMOCD by sundry (Form C-103) within ten (10) days of the well being spud					
kpickford	d Once the well is spud, to prevent ground water contamination through whole or partial conduits from the surface, the operator shall drill without interruption through the fresh					
	water zone or zones and shall immediately set in cement the water protection string					

kpickford Oil base muds are not to be used until fresh water zones are cased and cemented providing isolation from the oil or diesel. This includes synthetic oils. Oil based mud,

1. Geologic Formations

TVD of Target	3,950'
MD at TD	9,804'

Formation	Depth
Quaternary	0'
Tansill	250'
Yates	330'
Seven Rivers	575'
Queen	1115'
Grayburg	1565'
San Andres	1910'
Glorieta	3315'
Yeso	3425'
Base Yeso	5475'

^{*}H2S, water flows, loss of circulation, abnormal pressures, etc.

2. Casing Program

All casing strings will be tested in accordance with Onshore Oil and Gas Order #2 III.B.1.h

Primary Plan:

١	Hole Size (in)	Casing	Interval	erval Csg. Size Weight (in) (lbs)	Csg. Size Weight	Weight Grade	sg. Size Weight	Csg. Size Weight		Grade Conn.	SF	SF Burst Body	Body SF	Joint SF
	note size (III)	From (ft)	To (ft)		Grade	Com.	Collapse	or Duist	Tension	Tension				
	12.25	0	1800	9.625	36	J-55	BTC	1.125	1.2	1.4	1.4			
	8.75	0	4350	7	32	L-80	BK-HT	1.125	1.2	1.4	1.4			
	8.75	4350	9804	5.5	20	L-80	BK-HT	1.125	1.2	1.4	1.4			
									SF Values will	meet or Exceed	l			

	Y or N
Is casing new? If used, attach certification as required in Onshore Order #1	Y
Does casing meet API specifications? If no, attach casing specification sheet.	Y
Is premium or uncommon casing planned? If yes attach casing specification sheet.	N
Does the above casing design meet or exceed BLM's minimum standards? If not provide justification (loading assumptions, casing design criteria).	Y
Will the intermediate pipe be kept at a minimum 1/3 fluid filled to avoid approaching the collapse pressure rating of the casing?	Y
Is well located within Capitan Reef?	N
If yes, does production casing cement tie back a minimum of 50' above the Reef?	
Is well within the designated 4 string boundary.	
Is well located in SOPA but not in R-111-P?	N
If yes, are the first 2 strings cemented to surface and 3 rd string cement tied back 500' into previous casing?	
Is well located in R-111-P and SOPA?	N
If yes, are the first three strings cemented to surface?	
Is 2 nd string set 100' to 600' below the base of salt?	
Is well located in high Cave/Karst?	N
If yes, are there two strings cemented to surface?	
Is well located in critical Cave/Karst?	N
If yes, are there three strings cemented to surface?	

3. Cementing Program

Primary Plan:

Casing String	Top (ft)	Bottom (ft)	% Excess
Surface (Lead)	0	950	100%
Surface (Tail)	950	1800	165%
Production (Lead)	0	3350	100%
Production (Tail)	3350	9804	25%

Casing String	# Sks	Wt. (lb/gal)	Yld (ft3/sack)	H20 (gal/sk)	500# Comp. Strength (hours)	Slurry Description
Surface (Lead)	270	12.2	2.31	13.48	8:12	Clas C Premium Plus Cement
Surface (Tail)	394	13.2	1.84	9.92	6:59	Clas C Premium Plus Cement
Production (Lead)	302	11.8	2.54	15.29	N/A	Clas C Premium Plus Cement
Production (Tail)	1059	13.2	1.81	9.81	N/A	Clas C Premium Plus Cement

4. Pressure Control Equipment

Spur Energy Partners LLC variance for flex hose

1. Spur requests a variance to use a flex line from the BOP to the choke manifold. Documentation will be attached in the APD and be readily available. No external damage to flex line. Flex line to be installed as straight as possible (no bends).

BOP installed and tested before drilling which hole?	Size?	Min. Required WP	Туре		✓	Tested to:
		5M	Annula	r	✓	70% of working pressure
10.05" []-1-	13-5/8"		Blind Ra	m	✓	
12.25" Hole	13-3/8	5M	Pipe Rar	n	✓	250 psi / 3000 psi
			Double R	am		230 psi / 3000 psi
			Other*			
		5M	Annula	r	√	70% of working pressure
8.75" Hole	13-5/8"	534	Blind Ra	m	✓	
8.75 Hole			Pipe Rar	n	✓	250: / 2000:
		5M	Double R	am		250 psi / 3000 psi
			Other*			

Spur Energy Partners LLC will be utilizing a 5M BOP

Condition	Specify what type and where?
BH Pressure at deepest TVD	1898 psi
Abnormal Temperature	No
BH Temperature at deepest TVD	113°F

^{*}Specify if additional ram is utilized.

BOP/BOPE will be tested by an independent service company to 250 psi low and the high pressure indicated above per Onshore Order 2 requirements. The System may be upgraded to a higher pressure but still tested to the working pressure listed in the table above. If the system is upgraded all the components installed will be functional and tested.

Pipe rams will be operationally checked each 24-hour period. Blind rams will be operationally checked on each trip out of the hole. These checks will be noted on the daily tour sheets. Other accessories to the BOP equipment will include a Kelly cock and floor safety valve (inside BOP) and choke lines and choke manifold. See attached schematics.

Formation integrity test will be performed per Onshore Order #2.

On Exploratory wells or on that portion of any well approved for a 5M BOPE system or greater, a pressure integrity test of each casing shoe shall be performed. Will be tested in accordance with Onshore Oil and Gas Order #2 III.B.1.i.

Y	Are anchors required by manufacturer?
A con	ventional wellhead system will be employed. The wellhead and connection to the
BOPE	will meet all API 6A requirements. The BOP will be tested per Onshore Order #2
after in	nstallation on the surface casing which will cover testing requirements for a maximum
of 30 d	days.
See att	tached schematics.

5. BOP Break Testing Request

Spur Energy Partners LLC requests permission to adjust the BOP break testing requirements as follows:

BOP break test under the following conditions:

- After a full BOP test is conducted
- When skidding to drill the production section, where the surface casing point is shallower than the 3 Bone Spring or 10,000 TVD.
- When skidding to drill a production section that does not penetrate the 3rd Bone Spring or deeper.

If the kill line is broken prior to skid, four tests will be performed.

- 1) The void between the wellhead and the spool (this consists of two tests)
- 2) The spool between the kill lines and the choke manifold (this consists of two tests)

If the kill line is not broken prior to skid, two tests will be performed.

1) The void between the wellhead and the pipe rams

6. Mud Program

Sufficient mud materials to maintain mud properties and meet minimum lost circulation and weight increase requirements will be kept on location at all times. The following is a general list of products: Barite, Bentonite, Gypsum, Lime, Soda Ash, Caustic Soda, Nut Plug, Cedar Fiber, Cotton Seed Hulls, Drilling Paper, Salt Water Clay, CACL2. Spur will use a closed mud system.

Depth		Trmo	Weight	Viscosity	Water Loss
From (ft)	To (ft)	Туре	(ppg)	viscosity	water Loss
0	1800	Water-Based Mud	8.6-8.9	32-36	N/C
1800	9804	Water-Based Mud	8.6-8.9	32-36	N/C

	What will be used to monitor the loss or gain of fluid?	PVT/PASON/Visual Monitoring
--	---	-----------------------------

7. Logging and Testing Procedures

Logg	Logging, Coring and Testing.							
Yes	Will run GR from TD to	o surface (horizontal well – vertical p	ortion of hole). Stated logs					
	run will be in the Comp	letion Report and submitted to the Bl	LM.					
No	Logs are planned based	on well control or offset log informa	tion.					
No	Drill stem test? If yes, e	explain						
No	Coring? If yes, explain							
Addi	tional logs planned	Interval						
No	Resistivity							
No	Density							
No	CBL							
Yes	Mud log	ICP - TD						
No	PEX							

8. Drilling Conditions

Pump high viscosity sweeps as needed for hole cleaning. The mud system will be monitored visually/manually as well as with an electronic PVT. The necessary mud products for additional weight and fluid loss control will be on location at all times. Appropriately weighted mud will be used to isolate potential gas, oil, and water zones until such time as casing can be cemented into place for zonal isolation.

Hyd	rogen Sulfide (H2S) monitors will be installed prior to drilling out the surface shoe. If H2S
is de	etected in concentrations greater than 100 ppm, the operator will comply with the provisions
of O	Inshore Oil and Gas Order #6. If Hydrogen Sulfide is encountered, measured values and
form	nations will be provided to the BLM.
N	H2S is present
Y	H2S Plan attached

Total estimated cuttings volume: 991.6 bbls.

9. Other facets of operation

_	Yes/No
Will more than one drilling rig be used for drilling operations? If yes, describe.	Yes
Spur Energy Partners LLC. requests the option to contract a Surface Rig to drill,	
set surface casing, and cement for this well. If the timing between rigs is such that	
Spur Energy Partners LLC. would not be able to preset surface, the Primary Rig	
will MIRU and drill the well in its entirety per the APD. Please see the attached	
document for information on the spudder rig.	

Attachments

- _x__ Directional Plan
- _x__ H2S Contingency Plan
- _x__ Akita 57 Attachments
- _x__ BOP Schematics
- _x__ Transcend Spudder Rig Attachments

10. Company Personnel

<u>Name</u>	<u>Title</u>	Office Phone	Mobile Phone
Christopher Hollis	Drilling Manager	832-930-8629	713-380-7754
Johnny Nabors	Senior Vice President Operations	832-930-8502	281-904-8811



Spur Energy Partners, LLC

Eddy County, NM (NAD 83 - NME) WAUKEE C 36 STATE COM 51H

Wellbore #1

Plan: PLAN #1

Standard Planning Report

30 September, 2021





Project:

Planning Report



WBDS SQL 2 Database: Company:

Spur Energy Partners, LLC Eddy County, NM (NAD 83 - NME) WAUKEE C 36 STATE COM

Site: Well: 51H

Wellbore: Wellbore #1 Design: PLAN #1

Local Co-ordinate Reference:

TVD Reference: MD Reference: North Reference:

Survey Calculation Method:

Well 51H

RKB = 20' @ 3696.00usft (AKITA 57) RKB = 20' @ 3696.00usft (AKITA 57)

Minimum Curvature

Project Eddy County, NM (NAD 83 - NME)

Map System: Geo Datum:

Map Zone:

US State Plane 1983 North American Datum 1983 New Mexico Eastern Zone

System Datum:

Mean Sea Level

Site WAUKEE C 36 STATE COM

+E/-W

Site Position: From: Мар **Position Uncertainty:**

Northing: Easting:

Slot Radius:

649,489.60 usft 575,829.90 usft 13.200 in

Latitude: Longitude: **Grid Convergence:**

32.7854290 -104.2210960

0.061°

Well 51H

Well Position +N/-S

1.444.40 usft -18.40 usft

0.00 usft

Northing: Easting:

650.934.00 usft 575,811.50 usft

Latitude: Longitude:

32.7893992 -104.2211508

Position Uncertainty

0.00 usft

Wellhead Elevation:

Ground Level:

3,676.00 usft

Wellbore Wellbore #1

Declination **Magnetics Model Name** Sample Date **Dip Angle** Field Strength (°) (°) (nT) 47.727.73672676 IGRF2020 9/30/2021 6.857 60.307

PLAN #1 Design

Audit Notes:

Version:

Phase:

PLAN

Tie On Depth:

0.00

Vertical Section:

Depth From (TVD)

+N/-S

+E/-W (usft)

Direction (°)

(usft) (usft) 0.00 0.00 0.00 270.60

Plan Survey Tool Program

Depth From

(usft)

Depth To (usft)

Survey (Wellbore)

Date 9/30/2021

Tool Name

Remarks

0.00

9,803.69 PLAN #1 (Wellbore #1) MWD+IGRF

OWSG MWD + IGRF or WN

Plan Section	ıs									
Measured Depth (usft)	Inclination (°)	Azimuth (°)	Vertical Depth (usft)	+N/-S (usft)	+E/-W (usft)	Dogleg Rate (°/100ft)	Build Rate (°/100ft)	Turn Rate (°/100ft)	TFO (°)	Target
0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.000	
300.00	0.00	0.00	300.00	0.00	0.00	0.00	0.00	0.00	0.000	
700.80	8.02	159.85	699.49	-26.28	9.64	2.00	2.00	0.00	159.850	
3,074.10	8.02	159.85	3,049.61	-336.98	123.65	0.00	0.00	0.00	0.000	
4,125.88	60.00	270.60	3,923.48	-408.46	-355.99	6.00	4.94	10.53	114.759	
4,325.88	60.00	270.60	4,023.48	-406.66	-529.19	0.00	0.00	0.00	0.000	
4,642.53	91.67	270.60	4,100.00	-403.50	-832.30	10.00	10.00	0.00	0.000 F	LAT FTP 51H: 183
9,753.76	91.67	270.60	3,951.45	-350.32	-5,941.10	0.00	0.00	0.00	0.000 F	LAT LTP 51H: 183
9,803.69	91.67	270.60	3,950.00	-349.80	-5,991.00	0.00	0.00	0.00	0.000 F	PLAT BHL 51H: 180



Planning Report



Database: Company: Project:

Site:

WBDS_SQL_2

Spur Energy Partners, LLC Eddy County, NM (NAD 83 - NME) WAUKEE C 36 STATE COM

 Well:
 51H

 Wellbore:
 Wellbore #1

 Design:
 PLAN #1

Local Co-ordinate Reference:

TVD Reference: MD Reference: North Reference:

Survey Calculation Method:

Well 51H

RKB = 20' @ 3696.00usft (AKITA 57)

RKB = 20' @ 3696.00usft (AKITA 57)

Grid

Minimum Curvature

_									
Planned Survey									
Measured Depth (usft)	Inclination (°)	Azimuth (°)	Vertical Depth (usft)	+N/-S (usft)	+E/-W (usft)	Vertical Section (usft)	Dogleg Rate (°/100ft)	Build Rate (°/100ft)	Turn Rate (°/100ft)
0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
100.00	0.00	0.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00
200.00	0.00	0.00	200.00	0.00	0.00	0.00	0.00	0.00	0.00
300.00	0.00	0.00	300.00	0.00	0.00	0.00	0.00	0.00	0.00
400.00	2.00	159.85	399.98	-1.64	0.00	-0.62	2.00	2.00	0.00
500.00	4.00	159.85	499.84	-6.55	2.40	-2.47	2.00	2.00	0.00
600.00	6.00	159.85	599.45	-14.73	5.41	-5.56	2.00	2.00	0.00
700.80	8.02	159.85	699.49	-26.28	9.64	-9.92	2.00	2.00	0.00
800.00	8.02	159.85	797.72	-39.26	14.41	-14.82	0.00	0.00	0.00
900.00	8.02	159.85	896.75	-52.36	19.21	-19.76	0.00	0.00	0.00
1,000.00	8.02	159.85	995.77	-65.45	24.02	-24.70	0.00	0.00	0.00
1,100.00	8.02	159.85	1,094.79	-78.54	28.82	-29.64	0.00	0.00	0.00
1,200.00	8.02	159.85	1,193.82	-91.63	33.62	-34.58	0.00	0.00	0.00
1,300.00	8.02	159.85	1,292.84	-104.72	38.43	-39.52	0.00	0.00	0.00
1,400.00	8.02	159.85	1,391.86	-117.81	43.23	-44.46	0.00	0.00	0.00
1,500.00	8.02	159.85	1,490.89	-130.90	48.03	-49.40	0.00	0.00	0.00
1,600.00	8.02	159.85	1,589.91	-144.00	52.84	-54.34	0.00	0.00	0.00
1,700.00	8.02	159.85	1,688.93	-157.09	57.64	-59.28	0.00	0.00	0.00
1,800.00	8.02	159.85	1,787.95	-170.18	62.45	-64.22	0.00	0.00	0.00
1,900.00	8.02	159.85	1,886.98	-183.27	67.25	-69.16	0.00	0.00	0.00
2,000.00	8.02	159.85	1,986.00	-196.36	72.05	-74.11	0.00	0.00	0.00
2,100.00	8.02	159.85	2,085.02	-209.45	76.86	-79.05	0.00	0.00	0.00
2,200.00	8.02	159.85	2,184.05	-222.54	81.66	-83.99	0.00	0.00	0.00
2,300.00	8.02	159.85	2,283.07	-235.64	86.46	-88.93	0.00	0.00	0.00
2,400.00	8.02	159.85	2,382.09	-248.73	91.27	-93.87	0.00	0.00	0.00
2,500.00	8.02	159.85	2,481.11	-261.82	96.07	-98.81	0.00	0.00	0.00
2,600.00	8.02	159.85	2,580.14	-274.91	100.88	-103.75	0.00	0.00	0.00
2,700.00	8.02	159.85	2,679.16	-288.00	105.68	-108.69	0.00	0.00	0.00
2,800.00	8.02	159.85	2,778.18	-301.09	110.48	-113.63	0.00	0.00	0.00
2,900.00	8.02	159.85	2,877.21	-314.18	115.29	-118.57	0.00	0.00	0.00
3,000.00	8.02	159.85	2,976.23	-327.28	120.09	-123.51	0.00	0.00	0.00
3,074.10	8.02	159.85	3,049.61	-336.98	123.65	-127.17	0.00	0.00	0.00
3,100.00	7.50	170.73	3,075.27	-340.34	124.55	-128.10	6.00	-2.00	42.00
3,150.00	7.37	194.05	3,124.86	-346.67	124.29	-127.92	6.00	-0.26	46.65
3,200.00	8.38	214.81	3,174.40	-352.78	121.43	-125.12	6.00	2.03	41.51
3,250.00	10.21	229.67	3,223.75	-358.64	115.97	-119.72	6.00	3.65	29.73
3,300.00	12.49	239.63	3,272.77	-364.24	107.93	-111.74	6.00	4.56	19.92
3,350.00	15.02	246.42	3,321.34	-369.57	97.33	-101.19	6.00	5.07	13.58
3,400.00	17.70	251.24	3,369.31	-374.60	84.19	-88.10	6.00	5.35	9.65
3,450.00	20.46	254.82	3,416.56	-379.34	68.55	-72.52	6.00	5.53	7.15
3,500.00 3,550.00 3,600.00 3,650.00 3,700.00	23.28 26.14 29.03 31.93 34.85	257.57 259.75 261.52 263.00 264.26	3,462.96 3,508.37 3,552.68 3,595.77 3,637.51	-383.76 -387.84 -391.59 -394.99 -398.03	50.46 29.97 7.12 -18.00 -45.35	-54.48 -34.03 -11.22 13.87 41.18	6.00 6.00 6.00 6.00	5.64 5.72 5.77 5.81 5.84	5.50 4.36 3.55 2.96 2.51
3,750.00 3,800.00 3,850.00 3,900.00 3,950.00	37.78 40.72 43.67 46.62 49.58	265.34 266.29 267.14 267.89 268.58	3,677.80 3,716.51 3,753.55 3,788.81 3,822.20	-400.71 -403.00 -404.92 -406.45 -407.59	-74.84 -106.39 -139.91 -175.32 -212.51	70.64 102.16 135.66 171.05 208.23	6.00 6.00 6.00 6.00	5.86 5.88 5.89 5.90 5.91	2.17 1.90 1.69 1.51 1.37
4,000.00	52.54	269.21	3,853.63	-408.34	-251.39	247.10	6.00	5.92	1.26
4,050.00	55.50	269.79	3,883.00	-408.69	-291.84	287.54	6.00	5.93	1.16
4,100.00	58.46	270.33	3,910.24	-408.64	-333.76	329.46	6.00	5.93	1.08
4,125.88	60.00	270.60	3,923.48	-408.46	-355.99	351.69	6.00	5.93	1.03



Site:

Planning Report



Database: Company: Project: WBDS_SQL_2

Spur Energy Partners, LLC Eddy County, NM (NAD 83 - NME) WAUKEE C 36 STATE COM

 Well:
 51H

 Wellbore:
 Wellbore #1

 Design:
 PLAN #1

Local Co-ordinate Reference:

TVD Reference: MD Reference: North Reference:

Survey Calculation Method:

Well 51H

RKB = 20' @ 3696.00usft (AKITA 57) RKB = 20' @ 3696.00usft (AKITA 57)

Crid

Minimum Curvature

Design.	1 = 7 (1 1 // 1								
Planned Survey									
Measured Depth (usft)	Inclination (°)	Azimuth (°)	Vertical Depth (usft)	+N/-S (usft)	+E/-W (usft)	Vertical Section (usft)	Dogleg Rate (°/100ft)	Build Rate (°/100ft)	Turn Rate (°/100ft)
4,200.00	60.00	270.60	3,960.54	-407.79	-420.18	415.89	0.00	0.00	0.00
4,300.00	60.00	270.60	4,010.54	-406.89	-506.78	502.49	0.00	0.00	0.00
4,325.88	60.00	270.60	4,023.48	-406.66	-529.19	524.90	0.00	0.00	0.00
4,350.00	62.41	270.60	4,035.10	-406.44	-550.33	546.04	10.00	10.00	0.00
4,400.00	67.41	270.60	4,056.29	-405.96	-595.59	591.31	10.00	10.00	0.00
4,450.00	72.41	270.60	4,073.46	-405.48	-642.53	638.25	10.00	10.00	0.00
4,500.00	77.41	270.60	4,086.47	-404.97	-690.79	686.51	10.00	10.00	0.00
4,550.00	82.41	270.60	4,095.23	-404.46	-740.00	735.72	10.00	10.00	0.00
4,600.00	87.41	270.60	4,099.66	-403.94	-789.78	785.51	10.00	10.00	0.00
4,642.53	91.67	270.60	4,100.00	-403.50	-832.30	828.03	10.00	10.00	0.00
4,700.00	91.67	270.60	4,098.33	-402.90	-889.74	885.48	0.00	0.00	0.00
4,800.00	91.67	270.60	4,095.42	-401.86	-989.70	985.43	0.00	0.00	0.00
4,900.00	91.67	270.60	4,092.52	-400.82	-1,089.65	1,085.39	0.00	0.00	0.00
5,000.00	91.67	270.60	4,089.61	-399.78	-1,189.60	1,185.35	0.00	0.00	0.00
5,100.00	91.67	270.60	4,086.70	-398.74	-1,289.55	1,285.31	0.00	0.00	0.00
5,200.00	91.67	270.60	4,083.80	-397.70	-1,389.51	1,385.26	0.00	0.00	0.00
5,300.00	91.67	270.60	4,080.89	-396.66	-1,489.46	1,485.22	0.00	0.00	0.00
5,400.00	91.67	270.60	4,077.99	-395.62	-1,589.41	1,585.18	0.00	0.00	0.00
5,500.00	91.67	270.60	4,075.08	-394.58	-1,689.36	1,685.14	0.00	0.00	0.00
5,600.00	91.67	270.60	4,072.17	-393.54	-1,789.31	1,785.10	0.00	0.00	0.00
5,700.00	91.67	270.60	4,069.27	-392.50	-1,889.27	1,885.05	0.00	0.00	0.00
5,800.00	91.67	270.60	4,066.36	-391.46	-1,989.22	1,985.01	0.00	0.00	0.00
5,900.00	91.67	270.60	4,063.45	-390.42	-2,089.17	2,084.97	0.00	0.00	0.00
6,000.00	91.67	270.60	4,060.55	-389.38	-2,189.12	2,184.93	0.00	0.00	0.00
6,100.00	91.67	270.60	4,057.64	-388.34	-2,289.08	2,284.88	0.00	0.00	0.00
6,200.00	91.67	270.60	4,054.73	-387.30	-2,389.03	2,384.84	0.00	0.00	0.00
6,300.00	91.67	270.60	4,051.83	-386.25	-2,488.98	2,484.80	0.00	0.00	0.00
6,400.00	91.67	270.60	4,048.92	-385.21	-2,588.93	2,584.76	0.00	0.00	0.00
6,500.00	91.67	270.60	4,046.02	-384.17	-2,688.89	2,684.72	0.00	0.00	0.00
6,600.00	91.67	270.60	4,043.11	-383.13	-2,788.84	2,784.67	0.00	0.00	0.00
6,700.00	91.67	270.60	4,040.20	-382.09	-2,888.79	2,884.63	0.00	0.00	0.00
6,800.00	91.67	270.60	4,037.30	-381.05	-2,988.74	2,984.59	0.00	0.00	0.00
6,900.00	91.67	270.60	4,034.39	-380.01	-3,088.70	3,084.55	0.00	0.00	0.00
7,000.00	91.67	270.60	4,031.48	-378.97	-3,188.65	3,184.50	0.00	0.00	0.00
7,100.00	91.67	270.60	4,028.58	-377.93	-3,288.60	3,284.46	0.00	0.00	0.00
7,200.00	91.67	270.60	4,025.67	-376.89	-3,388.55	3,384.42	0.00	0.00	0.00
7,300.00	91.67	270.60	4,022.77	-375.85	-3,488.50	3,484.38	0.00	0.00	0.00
7,400.00	91.67	270.60	4,019.86	-374.81	-3,588.46	3,584.34	0.00	0.00	0.00
7,500.00	91.67	270.60	4,016.95	-373.77	-3,688.41	3,684.29	0.00	0.00	0.00
7,600.00	91.67	270.60	4,014.05	-372.73	-3,788.36	3,784.25	0.00	0.00	0.00
7,700.00	91.67	270.60	4,011.14	-371.69	-3,888.31	3,884.21	0.00	0.00	0.00
7,800.00	91.67	270.60	4,008.23	-370.65	-3,988.27	3,984.17	0.00	0.00	0.00
7,900.00	91.67	270.60	4,005.33	-369.61	-4,088.22	4,084.12	0.00	0.00	0.00
8,000.00	91.67	270.60	4,002.42	-368.57	-4,188.17	4,184.08	0.00	0.00	0.00
8,100.00	91.67	270.60	3,999.51	-367.53	-4,288.12	4,284.04	0.00	0.00	0.00
8,200.00	91.67	270.60	3,996.61	-366.49	-4,388.08	4,384.00	0.00	0.00	0.00
8,300.00	91.67	270.60	3,993.70	-365.45	-4,488.03	4,483.96	0.00	0.00	0.00
8,400.00	91.67	270.60	3,990.80	-364.40	-4,587.98	4,583.91	0.00	0.00	0.00
8,500.00	91.67	270.60	3,987.89	-363.36	-4,687.93	4,683.87	0.00	0.00	0.00
8,600.00	91.67	270.60	3,984.98	-362.32	-4,787.89	4,783.83	0.00	0.00	0.00
8,700.00	91.67	270.60	3,982.08	-361.28	-4,887.84	4,883.79	0.00	0.00	0.00
8,800.00	91.67	270.60	3,979.17	-360.24	-4,987.79	4,983.74	0.00	0.00	0.00
8,900.00	91.67	270.60	3,976.26	-359.20	-5,087.74	5,083.70	0.00	0.00	0.00
9,000.00	91.67	270.60	3,973.36	-358.16	-5,187.69	5,183.66	0.00	0.00	0.00



Planning Report



Database: Company: Project: WBDS_SQL_2

Spur Energy Partners, LLC Eddy County, NM (NAD 83 - NME)

WAUKEE C 36 STATE COM

Site: WAUKEE C
Well: 51H
Wellbore: Wellbore #1
Design: PLAN #1

Local Co-ordinate Reference:

TVD Reference: MD Reference: North Reference:

Survey Calculation Method:

Well 51H

RKB = 20' @ 3696.00usft (AKITA 57)

RKB = 20' @ 3696.00usft (AKITA 57)

Grid

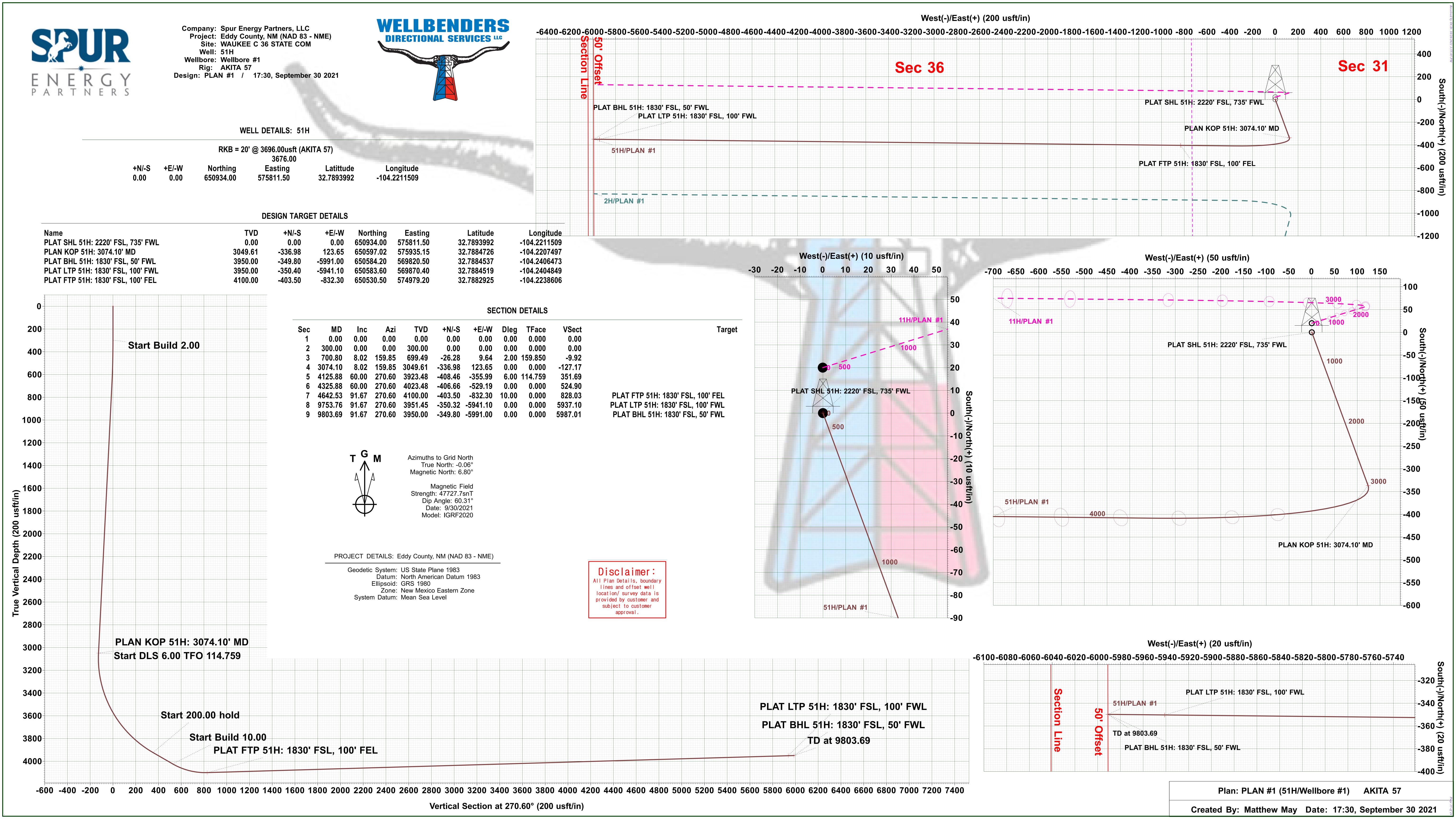
Minimum Curvature

ΡI	an	ne	Ы	Su	rvev	
П	all	IIIE	u	Ju	II VEV	

Measured Depth (usft)	Inclination (°)	Azimuth (°)	Vertical Depth (usft)	+N/-S (usft)	+E/-W (usft)	Vertical Section (usft)	Dogleg Rate (°/100ft)	Build Rate (°/100ft)	Turn Rate (°/100ft)
9,100.00	91.67	270.60	3,970.45	-357.12	-5,287.65	5,283.62	0.00	0.00	0.00
9,200.00	91.67	270.60	3,967.55	-356.08	-5,387.60	5,383.57	0.00	0.00	0.00
9,300.00	91.67	270.60	3,964.64	-355.04	-5,487.55	5,483.53	0.00	0.00	0.00
9,400.00	91.67	270.60	3,961.73	-354.00	-5,587.50	5,583.49	0.00	0.00	0.00
9,500.00	91.67	270.60	3,958.83	-352.96	-5,687.46	5,683.45	0.00	0.00	0.00
9,600.00	91.67	270.60	3,955.92	-351.92	-5,787.41	5,783.41	0.00	0.00	0.00
9,700.00	91.67	270.60	3,953.01	-350.88	-5,887.36	5,883.36	0.00	0.00	0.00
9,753.76	91.67	270.60	3,951.45	-350.32	-5,941.10	5,937.11	0.00	0.00	0.00
9,803.69	91.67	270.60	3,950.00	-349.80	- 5,991.00	5,987.01	0.00	0.00	0.00

Design	ıargets
--------	---------

Target Name - hit/miss target - Shape	Dip Angle (°)	Dip Dir. (°)	TVD (usft)	+N/-S (usft)	+E/-W (usft)	Northing (usft)	Easting (usft)	Latitude	Longitude
PLAT SHL 51H: 2220' - plan hits target co - Point	0.00 enter	0.00	0.00	0.00	0.00	650,934.00	575,811.50	32.7893992	-104.2211508
PLAN KOP 51H: 3074 - plan hits target co - Point	0.00 enter	0.00	3,049.61	-336.98	123.65	650,597.03	575,935.15	32.7884726	-104.2207496
PLAT BHL 51H: 1830' - plan hits target co - Point	0.00 enter	0.00	3,950.00	-349.80	-5,991.00	650,584.20	569,820.50	32.7884537	-104.2406472
PLAT LTP 51H: 1830' - plan misses targo - Point	0.00 et center by		-,	-350.40 ft MD (3951.	-5,941.10 45 TVD, -35	650,583.60 0.32 N, -5941.10	569,870.40 E)	32.7884519	-104.2404849
PLAT FTP 51H: 1830' - plan hits target c - Point	0.00 enter	0.00	4,100.00	-403.50	-832.30	650,530.50	574,979.20	32.7882925	-104.2238606





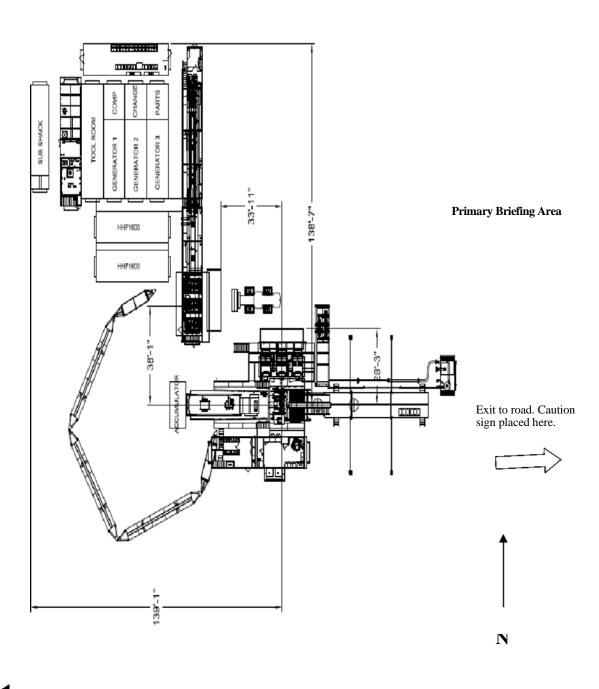
Permian Drilling Hydrogen Sulfide Drilling Operations Plan Waukee C 36 State Com 51H

Open drill site. No homes or buildings are near the proposed location.

1. Escape

Personnel shall escape upwind of wellbore in the event of an emergency gas release. Escape can take place through the lease road on the Southeast side of the location. Personnel need to move to a safe distance and block the entrance to location. If the primary route is not an option due to the wind direction, then a secondary egress route should be taken.

Secondary Briefing Area





WIND: Prevailing winds are from the <u>Southwest</u>



Inten	t	As Dril	led											
API#	ł													
Оре	rator Nai	ne:				Property Name:							Well Number	
Kick (Off Point	(KOP)												
UL	Section	Township	Range	Lot	Feet		From N	I/S	Feet		From	n E/W	County	
Latit	ude				Longitu	Longitude NAD						NAD		
First ⁻	Take Poir	it (FTP)												
UL	Section	Township	Range	Lot	Feet	Feet From N/S Feet From E/W County					County			
Latit	ude		Longitu	ıde							NAD			
Last 1	Section	t (LTP) Township	Pango	Lot	Feet	Eron	n N/C	Foot		From F	-/\\	Count		
Latit		Township	Range	Lot	Longitu		n N/S	Feet		From E	-/ vv	Count	У	
Latiti	ude				Longitu	itude NAD								
Is this	s well the	defining w	vell for th	e Hori:	zontal Sp	pacing	g Unit?			7				
										_				
Is this	s well an	infill well?												
											· -			
	ll is yes p ng Unit.	iease provi	de API if	avaılak	oie, Opei	rator N	vame	and v	vell ni	umber	tor E	Jetinir	ng well to	or Horizontal
API#	!													
Ope	rator Nai	me:	1			Prop	erty N	ame:	:					Well Number
						1								V7.0C/20/2016

KZ 06/29/2018

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.

Section 1 – Plan Description Effective May 25, 2021

		Effe	ective May 25, 2	2021							
I. Operator: SPUR ENERGY PARTNERS LLC OGRID: 328947 Date: 09 / 22 / 2021											
II. Type: \bowtie Original \square Amendment due to \square 19.15.27.9.D(6)(a) NMAC \square 19.15.27.9.D(6)(b) NMAC \square Other.											
If Other, please describe	If Other, please describe:										
	III. Well(s): Provide the following information for each new or recompleted well or set of wells proposed to be drilled or proposed to be recompleted from a single well pad or connected to a central delivery point.										
Well Name	API	ULSTR	Footages	Anticipated Oil BBL/D	Anticipated Gas MCF/D	Anticipated Produced Water BBL/D					
WAUKEE D 36 STATE COM 10H	30-015-PENDING	4-31-17S-28E	755' FSL 745' FWL	351 BBL/D	401 MCF/D	1753 BBL/D					
WAUKEE C 36 STATE COM 11H	30-015-PENDING	3-31-17S-28E	2240' FSL 735' FWL	351 BBL/D	401 MCF/D	1753 BBL/D					
WAUKEE C 36 STATE COM 51H	30-015-PENDING	3-31-17S-28E	2220' FSL 735' FWL	319 BBL/D	369 MCF/D	1356 BBL/D					
WAUKEE C 36 STATE COM 2H	30-015-PENDING	4-31-17S-28E	775' FSL 745' FWL	322 BBL/D	368 MCF/D	1609 BBL/D					
IV. Central Delivery Point Name: WAUKEE 36 STATE COM CENTRAL TANK BATTERY [See 19.15.27.9(D)(1) NMAC]											

V. Anticipated Schedule: Provide the following information for each new or recompleted well or set of wells proposed to be drilled or proposed to be recompleted from a single well pad or connected to a central delivery point.

Well Name	API	Spud Date	TD Reached	Completion	Initial Flow	First Production
			Date	Commencement Date	Back Date	Date
WAUKEE D 36 STATE COM 10H	30-015-PENDING	12/01/2021	12/11/2021	01/19/2022	02/04/2022	02/04/2022
WAUKEE C 36 STATE COM 11H	30-015-PENDING	01/03/2022	01/13/2022	01/27/2022	02/04/2022	02/04/2022
WAUKEE C 36 STATE COM 51H	30-015-PENDING	12/22/2021	01/03/2022	01/27/2022	02/04/2022	02/04/2022
WAUKEE C 36 STATE COM 2H	30-015-PENDING	12/11/2021	12/22/2021	01/19/2022	02/04/2022	02/04/2022

- VI. Separation Equipment: 🔀 Attach a complete description of how Operator will size separation equipment to optimize gas capture.
- VII. Operational Practices: ★ Attach a complete description of the actions Operator will take to comply with the requirements of Subsection A through F of 19.15.27.8 NMAC.
- VIII. Best Management Practices: X Attach a complete description of Operator's best management practices to minimize venting during active and planned maintenance.

Section 2 – Enhanced Plan EFFECTIVE APRIL 1, 2022

Beginning April 1, 2022, an operator that is not in compliance with its statewide natural gas capture requirement for the applicable reporting area must complete this section.

🛮 Operator certifies that it is not required to complete this section because Operator is in compliance with its statewide natural gas capture requirement for the applicable reporting area.

IX. Anticipated Natural Gas Production:

Well	API	Anticipated Average Natural Gas Rate MCF/D	Anticipated Volume of Natural Gas for the First Year MCF

X. Natural Gas Gathering System (NGGS):

Operator	System	ULSTR of Tie-in	Anticipated Gathering Start Date	Available Maximum Daily Capacity of System Segment Tie-in

XI. Map. \square Attach an accurate and legible map depicting the location of the well(s), the anticipated pipeline route(s) connecting the
production operations to the existing or planned interconnect of the natural gas gathering system(s), and the maximum daily capacity of
the segment or portion of the natural gas gathering system(s) to which the well(s) will be connected.

XII. Line Capacity. The natural gas gathering system \square will \square	will not have capacity to gather 100% of the anticipated natural gas
production volume from the well prior to the date of first product	ion.

XIII. Line Pressure. Operator \square does \square does not anticipate that its existing well(s) connected to the same segment,	or portion,	, of the
natural gas gathering system(s) described above will continue to meet anticipated increases in line pressure caused by	the new w	ell(s).

	olan to manage proc	luction in response to t	the increased line p	oressure
--	---------------------	--------------------------	----------------------	----------

XIV. Confidentiality: U Operator asserts confidentiality pursuant to Section 71-2-8 NMSA 1978 for the in	nformation provided in
Section 2 as provided in Paragraph (2) of Subsection D of 19.15.27.9 NMAC, and attaches a full description of t	the specific information
for which confidentiality is asserted and the basis for such assertion.	

D of 19.15.27.9 NMAC; or

Section 3 - Certifications <u>Effective May 25, 2021</u>

Operator certifies that, after reasonable inquiry and based on the available information at the time of submittal:

Operator will be able to connect the well(s) to a natural gas gathering system in the general area with sufficient capacity to transport one hundred percent of the anticipated volume of natural gas produced from the well(s) commencing on the date of first production, taking into account the current and anticipated volumes of produced natural gas from other wells connected to the pipeline gathering system: or

☐ Operator will not be able to connect to a natural gas gathering system in the general area with sufficient capacity to transport one hundred percent of the anticipated volume of natural gas produced from the well(s) commencing on the date of first production, taking into account the current and anticipated volumes of produced natural gas from other wells connected to the pipeline gathering system. If Operator checks this box, Operator will select one of the following:

Well Shut-In. ☐ Operator will shut-in and not produce the well until it submits the certification required by Paragraph (4) of Subsection

Venting and Flaring Plan.

Operator has attached a venting and flaring plan that evaluates and selects one or more of the potential alternative beneficial uses for the natural gas until a natural gas gathering system is available, including:

- (a) power generation on lease;
- **(b)** power generation for grid;
- compression on lease; (c)
- (d) liquids removal on lease;
- reinjection for underground storage; (e)
- **(f)** reinjection for temporary storage;
- (g) reinjection for enhanced oil recovery;
- fuel cell production; and (h)
- 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
- 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: Sarah Chapman
Printed Name: SARAH CHAPMAN
Title: REGULATORY DIRECTOR
E-mail Address: SCHAPMAN@SPUREPLLC.COM
Date: 09/22/2021
Phone: 832-930-8613
OIL CONSERVATION DIVISION
(Only applicable when submitted as a standalone form)
Approved By:
Title:
Approval Date:
Conditions of Approval:



Natural Gas Management Plan – Attachment

VI. Separation equipment will be sized by construction engineering staff based on anticipated daily production to ensure adequate capacity.

VII. Spur Energy Partners LLC ("Spur") will take the following actions to comply with the regulations listed in 19.15.27.8:

- A. Spur will maximize the recovery of natural gas by minimizing waste, as defined by 19.15.2 NMAC, of natural gas through venting and flaring. Spur will ensure that our wells will be connected to a natural gas gathering system with sufficient capacity to transport natural gas.
- B. All drilling operations will be equipped with a rig flare at least 100 feet from the nearest surface hole location. Rig flare will be utilized to combust any natural gas that is brought to surface during normal operations. In the case of emergency, flaring volumes will be reported appropriately.
- C. During completion operations any natural gas brought to surface will be flared. Immediately following completion operations, wells will flow to permanent separation equipment. Produced natural gas from separation equipment will be sent to sales. If natural gas does not meet gathering pipeline specifications, Spur will flare for 60 days or until natural gas meets the pipeline specifications. Spur will ensure flare is properly sized and is equipped with an automatic igniter or continuous pilot. Gas samples will be taken twice per week and natural gas will be routed into a gathering system as soon as the pipeline specifications are met.
- D. Natural gas will not be flared with the exception of 19.15.27.8(D)(1-4). If there is no adequate takeaway for the separator gas, wells will be shut-in until that natural gas gathering system is available with exception of emergency or malfunction situations. Volumes will be reported appropriately.
- E. Spur will comply with performance standards pursuant to 19.15.27.8(E)(1-8). All equipment will be designed and sized to handle maximum pressures to minimize waste. Storage tanks constructed after May 25, 2021 will be equipped with an automatic gauging system that reduces venting of natural gas. Flare stacks installed or replaced after May 25, 2021 will be equipped with an automatic ignitor or continuous pilot. Spur will conduct AVO inspections as described in 19.15.27.8(E)(5)(a) with frequencies specified in 19.15.27.8(E)(5)(b) and (c). All emergencies or malfunctions will be resolved as quickly and safely as possible to minimize waste.
- F. The volume of natural gas that is vented or flared as the result of an emergency or malfunction during drilling and/or completion operations will be estimated and reported accordingly. The volume of natural gas that is vented, flared or beneficially used during production operations, will be measured and reported accordingly. Spur will install equipment to measure the volume of natural gas flared from existing piping or a flowline piped from equipment such as high-pressure separators, heater treaters, or VRUs associated with a well or facility associated with a well authorized by an APD after May 25, 2021 that has an average daily production of less than 60,000 cubic feet of natural gas. If metering is not practicable due to circumstances such as low flow rate or low pressure venting or flaring, Spur will estimate the volume of flared or vented natural gas. Measuring equipment will conform to industry standards and will not be equipped with a manifold



that allows the diversion of natural gas around the metering element except for the sole purpose of inspecting and servicing equipment.

VIII. For maintenance activities involving production equipment and compression, venting be limited to the depressurization of the subject equipment to ensure safe working conditions. For maintenance of production equipment, the associated producing wells will be shut-in to eliminate venting. For maintenance of VRUs, all natural gas normally routed to the VRU will be routed to flare.