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

Date:

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

District IV

1220 S. St Francis Dr., Santa Fe, NM 87505 Phone:(505) 476-3470 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 354938

APPLICATION FOR PERMIT TO		NDAOK OD ADD	

	ame and Address								2. OGRID Num			
	orpion Oil & Gas, I									2127		
	79 South Main Stre	eet							3. API Number		_	
	afford, TX 77477									025-5236	7	
4. Property Co		4	5. Property Name					6. Well No.				
33	5046		BRONCO 9	STATE					001	1		
				7. Su	rface Locati	on						
UL - Lot	Section	Township	Range	Lot Idn	Feet From		N/S Line	Feet From	E/W	Line	County	
1	9	12S	38E	I	1	981	S	66	60	E		Lea
				8. Proposed	Bottom Hole	Location	i i i i i i i i i i i i i i i i i i i					
UL - Lot	Section	Township	Range	Lot Idn	Feet From		N/S Line	Feet From	E/W	Line	County	
1	9	12S	38E	1	1	981	S	66	60	E	-	Lea
				9 Po	ol Informatio	on						
GLADIOLA:	SAN ANDRES			3. FO	ormornau	011			27810			
				A -1-1141								
11. Work Type		12. Well Ty		Additiona 13. Cable/Rotary	al Well Inform	14. Lease	Tune	15 Crou	Ind Level Eleva	ation		
	w Well		DIL	15. Cable/Rolary		14. Lease	State	15. Glou	3851	ation		
16. Multiple		17. Propose		18. Formation		19. Contra		20. Spuc				
N			500	Tubb		11/30/2023						
Depth to Grou	ind water			Distance from neare	est fresh water	well		Distance	to nearest surf			
-												
🛛 We will be	using a closed-lo	op system in lie	u of lined pits	•								
				21. Proposed Ca	sing and Co	ment Proc	aram					
Туре	Hole Size	Casing	Size	Casing Weight/ft		Setting Depth Sacks of C			Cement Estimated TOC		OC	
Surf	12.25	9.62		32		2305		600			0	
Prod	8.5	5.5		20		7500 1615		0				
				Casing/Cement Pro	arom, Addit	ional Com	monto					
			,	asing/Cement Pro	gram: Addit	ional Con	iments					
				22. Proposed Blo	owout Preve	ntion Prog						
	Туре		W	orking Pressure			Test Pressu	re		Manu	ufacturer	
	Annular			5000			3000			Sc	hafer	
	Double Ram			5000			3000			Sc	hafer	
r												
		rmation given ab	ove is true and comp	ete to the best of m	ıy		0	IL CONSERVA	TION DIVISIO	DN		
knowledge a												
I further cer		ed with 19.15.14.	9 (A) NMAC 🛛 and/o	or 19.15.14.9 (B) NN	AC							
	idie.											
Signature:												
Printed Name	- Electronic	ally filed by Natha	aniel I Raggette		Approv	ed By:	Paul F Kautz	,				
Title:	CEO	any mod by realine			Title:	Dj.	Geologist	-				
Email Address		pionog.com				ed Date:	12/28/2023		Expiration	n Date: 12/2	8/2025	
Email Address		nonog.com			Approv	eu Dale.	12/20/2023		Expiration		0/2020	

Conditions of Approval Attached

11/30/2023

Phone: 281-306-6820

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

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

DISTRICT I

DISTRICT III

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

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

□AMENDED REPORT

# WELL LOCATION AND ACREAGE DEDICATION PLAT

API Number				Pool Code		Pool Name				
			278	10		GLADIOLA;SAN ANDRES				
Property C	ode				Property Nam	e			W	ell Number
335046				BF	RONCO 9 S	TATE			1	
OGRID N	No.				Operator Nam	e			Elevation	
332127			SCORPION OIL & GAS				3851'			
	Surface Location									
UL or lot No.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East	/West line	County
I	9	12-S	38-E		1981	SOUTH	660	E	EAST	LEA
Bottom Hole Location If Different From Surface										

UL or lot No.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
Dedicated Acres	Joint or	Infill C	onsolidation Co	ode Ord	er No.				

NO ALLOWABLE WILL BE ASSIGNED TO THIS COMPLETION UNTIL ALL INTERESTS HAVE BEEN CONSOLIDATED OR A NON-STANDARD UNIT HAS BEEN APPROVED BY THE DIVISION

			<b>OPERATOR CERTIFICATION</b> I hereby certify that the information herein is true and complete to the best of my knowledge and belief, and that this organization either owns a working interest or unleased mineral interest in the land including the proposed bottom hole location or has a right to drill this well at this location pursuant to a contract with an owner of such mineral or working interest, or to a voluntary pooling agreement or a compulsory pooling order heretofore entered by the division.
GEODETIC COORDINATES NAD 83 NME SURFACE LOCATION Y= 835819.6 N X= 919532.6 E LAT.=33.291453" N LONG.=103.095679" W	GEODETIC COORDINATES NAD 27 NME SURFACE LOCATION Y= 835755.8 N X= 878356.7 E LAT.=33.291347 <sup>-</sup> N LONG.=103.095179 <sup>*</sup> W		Mike Soulermilk       11/29/2023         Signature       Date         Mike Loudermilk         Printed Name         mike@scorpionog.com         E-mail Address
		Q ← 660' →	SURVEYOR CERTIFICATION I hereby certify that the well location shown on this plat was plotted from tight noise of the structure structure is the and correct to be designed with the structure is the NOVEMBER 25 2023 Date of Survey 12641 Signature Seal of Professional Surveyor:
			January         J. EiOson         11/29/2023           Certificate Number         Gary G. Eidson         12641           ACK         JWSC W.O.: 23.11.0363

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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

RMIT COMMENTS

Operator Name and Addres Scorpion Oil 8	s: · Gas, LLC [332127]	API Number: 30-025-52367		
4779 South M Stafford, TX 7		Well: BRONCO 9 STATE	#001	
Created By	Comment		Comment Date	
abustamante	Fee Cancellation - Canceled pending payment; never received within 24 hours.		11/30/2023	

PERMIT COM	MENTS

Form APD Comments

Permit 354938

.

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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

PERMIT CONDITIONS OF APPROVAL

Operator	Name and Address:	API Number:
	Scorpion Oil & Gas, LLC [332127]	30-025-52367
	4779 South Main Street	Well:
	Stafford, TX 77477	BRONCO 9 STATE #001
OCD	Condition	
Reviewer		
pkautz	Notify OCD 24 hours prior to casing & cement	
pkautz	MUST FILE DEVIATION SURVEY WITH C-104	
pkautz	Once the well is spud, to prevent ground water contamination through whole or partial conduits from the surface, the ope	erator shall drill without interruption through the fresh
	water zone or zones and shall immediately set in cement the water protection string	
pkautz	Oil base muds are not to be used until fresh water zones are cased and cemented providing isolation from the oil or die	sel. This includes synthetic oils. Oil based mud,
	drilling fluids and solids must be contained in a steel closed loop system	
pkautz	Cement is required to circulate on both surface and production strings of casing	
pkautz	If cement does not circulate on any string, a CBL is required for that string of casing	
pkautz	The Operator is to notify NMOCD by sundry (Form C-103) within ten (10) days of the well being spud	

Permit 354938

Page 4 of 13



November 29, 2023

# Bronco 9 01

#### 1. Geologic Name of surface location: Delaware Basin

2. Estimate tops of major geological markers.

Formation	Prog TVD	Prog SS	Lithology
Cenozoic Alluvium( surface)			
Rustler	2,300	1,567	Anhydrite
Yates	3,072	795	Sand
Seven Rivers	3,309	558	Dolomite & Sand
Queen	3,838	29	Dolomite & Sand
San Andres	4,438	-571	Dolomite- Oil/Gas/Water
Glorieta	5,942	-2,075	Dolomite & Sand
Tubb	7,175	-3,308	Dolomite & Sand

## 3. Estimated depth of anticipated fresh water, oil or gas:

Upper Permian Sands	0-400'	Fresh Water
San Andres	4438'	Oil
Glorieta	5942'	Oil
Tubb	7175'	Oil

No other formations are expected to give up oil, gas or fresh water in measurable quantities. Surface freshwater sands will be protected by setting 9 5/8" casing at 2505'and circulating cement back to surface.

## **Minimum Specifications for Pressure Control:**

The minimum blowout preventer equipment (BOPE) shown in Exhibit #1 will consist of a single ram, mud cross and double ram-type (5000 psi WP) preventer and an annular preventer (5000-psi WP). Both units will be hydraulically operated, and the ram-type will be equipped with blind rams on bottom and 4  $\frac{1}{2}$ " x 7" variable pipe rams on top.

All BOPE will be tested in accordance with Onshore Oil & Gas order No. 2. Before drilling out of the surface casing, the ram-type BOP and accessory equipment will be tested to 4000/250 psig and the annular preventer to 4000/250 psig. The surface casing will be tested to 1500 psi for 30 minutes.



Before drilling out of the intermediate casing, the ram-type BOP and accessory equipment will be tested to 4000/250 psig and the annular preventer to 4000/250 psig.

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.

# 6. Types and characteristics of the proposed mud system:

During this procedure we plan to use a Closed-Loop System and haul contents to the required disposal. The applicable depths and properties of the drilling fluid systems are as follows.

The highest mud weight needed to balance formation is expected to be 9-10 ppg. In order to maintain hole stability, mud weights up to 10 ppg may be utilized.

An electronic pit volume totalizer (PVT) will be utilized on the circulating system, to monitor pit volume, flow rate, pump pressure and stroke rate. Sufficient mud materials to maintain mud properties and meet minimum lost circulation and weight increase requirements will be kept at the wellsite at all times.

# 7. Auxiliary well control and monitoring equipment:

(A) A kelly cock will be kept in the drill string at all times.

(B) A full opening drill pipe-stabbing valve (inside BOP) with proper drill pipe connections will be kept on the rig floor at all times.

(C) H2S monitoring and detection equipment will be utilized from surface casing point to TD.

(D) A wear bushing will be installed in the wellhead prior to drilling out of the surface casing.

## 8. Logging, testing and coring program:

GR–CCL-CNL Will be run in cased hole during completions phase of operations. Open-hole logs are not planned for this well.

## 9. Abnormal conditions, pressures, temperatures and potential hazards:

The estimated bottom-hole temperature at 7500' TVD (deepest point of the well) is 170F with an estimated maximum bottom-hole pressure (BHP) at the same point of 3600 psig (based on 10 ppg MW).

## 10. Anticipated starting date and duration of operations:

The drilling operations on the well should be finished in approximately 2 weeks. Then completions operations and flow back will commence with first production expected 6 weeks from spud.

## 12. Disposal/environmental concerns:

(A) Drilled cuttings will be hauled to and disposed of in a state-certified disposal site.

(B) Non-hazardous waste mud/cement from the drilling process will also be hauled to and disposed of in a state-certified disposal site.

(C) Garbage will be hauled to the Lea County Landfill.

(D) Sewage (grey water) will be hauled to the closest disposal facility.



#### 13. Wellhead:

A multi-bowl wellhead system will be utilized.

After running the 9/58" surface casing, a 9-5/8" BOP/BOPE system with a minimum working pressure of 5000 psi will be installed on the wellhead system and will be pressure tested to 250 psi low followed by a 4000 psi pressure test. This pressure test will be repeated at least every 21 days.

The minimum working pressure of the BOP and related BOPE required for drilling below the surface casing shoe shall be 4000 psi.

The wellhead will be installed by a third party welder while being monitored by WH vendor's representative.

All BOP equipment will be tested utilizing a conventional test plug. Not a cup or J-packer type.

Both the surface and production casing strings will be tested as per NMOCD Rules to the one-third of manufacture's rated yield pressure, no less than 600 psi, but not greater than 1,500 psi.

Receive	ed hv	OCD:	11/30	/2023	10:12:28	AM
110000000		$vv\nu$ .	11/00/		IU.IM.MU	X # 17#

State of New Mexico Energy, Minerals and Natural Resources Department						Submit Electronically Via E-permitting		
		1220	onservation Di South St. Franc nta Fe, NM 87:	eis Dr.				
	Ν	ATURAL G	AS MANA(	GEMENT P	LAN			
This Natural Gas Mana	agement Plan m	nust be submitted w	rith each Applicat	ion for Permit to I	Drill (A	PD) for a 1	new or	recompleted well
			<u>1 – Plan De</u> ffective May 25,					
. Operator: Scorpio	n Oil & Gas LL	.C	OGRID:	332127		Date: _	11 /	29 / 2023
I. Type: X Original								
f Other, please describ	be:							
II. Well(s): Provide t	he following in	formation for each	new or recomple	ted well or set of	wells pi	roposed to	be dri	lled or proposed t
be recompleted from a	single well pad	l or connected to a	central delivery p	oint.				
we recompleted from a Well Name	API	l or connected to a ULSTR	central delivery p Footages	oint. Anticipated Oil BBL/D		icipated MCF/D	P	Anticipated roduced Water BBL/D
Well Name		_		Anticipated Oil BBL/D 125 BBL/D	Gas	-		roduced Water
Well Name Bronco 9 01	API TBD	ULSTR I-9-12S-38E	Footages 1981 FSL/660 FEI	Anticipated Oil BBL/D 125 BBL/D	Gas 50 N	MCF/D MCF/D	50	roduced Water BBL/D
Well Name Bronco 9 01 V. Central Delivery	API TBD Point Name:	ULSTR I-9-12S-38E	Footages 1981 FSL/660 FEI attion for each new	Anticipated Oil BBL/D 125 BBL/D	Gas 50 N	MCF/D MCF/D [See 1	50 9.15.2	roduced Water BBL/D 0 BBL/D 7.9(D)(1) NMAC
Well Name Bronco 9 01 W. Central Delivery	API TBD Point Name:	ULSTR I-9-12S-38E	Footages 1981 FSL/660 FEI ation for each new inected to a centr TD Reached	Anticipated Oil BBL/D 125 BBL/D / or recompleted w al delivery point. Completion	Gas 50 M	MCF/D MCF/D [See 1 set of wells Initial F	50 9.15.2 9 propo	roduced Water BBL/D 0 BBL/D 7.9(D)(1) NMAC sed to be drilled of First Production
Well Name Bronco 9 01 V. Central Delivery V. Anticipated Sched	API TBD Point Name: ule: Provide the leted from a sir	ULSTR I-9-12S-38E e following informa igle well pad or con	Footages 1981 FSL/660 FEI ation for each new nected to a centr	Anticipated Oil BBL/D 125 BBL/D	Gas 50 M	MCF/D MCF/D [See 1] set of wells	50 9.15.2 propo Tow Date	roduced Water BBL/D 0 BBL/D 7.9(D)(1) NMAC ssed to be drilled o
Well Name Bronco 9 01 V. Central Delivery V. Anticipated Sched proposed to be recomp Well Name Bronco 9 01	API TBD Point Name: ule: Provide the leted from a sir API TBD	ULSTR I-9-12S-38E e following informa ngle well pad or con Spud Date 12/29/2023	Footages 1981 FSL/660 FEI ation for each new mected to a centr TD Reached Date 1/5/2024	Anticipated Oil BBL/D 125 BBL/D v or recompleted w al delivery point. Completion Commencement 1/20/2024	Gas 50 M vell or s	MCF/D MCF/D [See 1 <sup>-</sup> set of wells Initial F Back D 1/22/202	50 9.15.2 9 propo Tow Date 24	roduced Water BBL/D 0 BBL/D 7.9(D)(1) NMAC sed to be drilled of First Production Date 2/1/2024
Bronco 9 01 IV. Central Delivery V. Anticipated Sched proposed to be recomp Well Name	API TBD Point Name: Point Name: ule: Provide the leted from a sir API TBD ment: \(\X) Attac ctices: \(\X) Attac	ULSTR I-9-12S-38E e following informangle well pad or con Spud Date 12/29/2023 h a complete descr ch a complete descr	Footages Footages Footages FSL/660 FEI FSL/660 FEI TD Reached Date 1/5/2024 FDTOT of how Ope	Anticipated Oil BBL/D 125 BBL/D 7 or recompleted w al delivery point. Completion Commencement 1/20/2024 erator will size sep	Gas 50 N vell or s Date	MCF/D MCF/D [See 1 set of wells Initial F Back D 1/22/202 equipmen	50 9.15.2 9 propo Flow Date 24 t to op	roduced Water BBL/D 0 BBL/D 7.9(D)(1) NMAC sed to be drilled of First Production Date 2/1/2024 timize gas capture

# 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.

Dependence of 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.**  $\Box$  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  $\Box$  will  $\Box$  will not have capacity to gather 100% of the anticipated natural gas production volume from the well prior to the date of first production.

**XIII.** Line Pressure. Operator  $\Box$  does  $\Box$  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 well(s).

□ Attach Operator's plan to manage production in response to the increased line pressure.

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

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

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

 $\square$  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

 $\Box$  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.**  $\Box$  Operator will shut-in and not produce the well until it submits the certification required by Paragraph (4) of Subsection D of 19.15.27.9 NMAC; or

**Venting and Flaring Plan.**  $\Box$  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;
- (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: Mike Loudermilk
Printed Name: Mike Loundermilk
Title: VP Operations
E-mail Address: Mike@scorpionog.com
Date: 11/29/2023
Phone: (281) 694-4571
OIL CONSERVATION DIVISION
(Only applicable when submitted as a standalone form)
Approved By:
Title:
Approval Date:
Conditions of Approval:

# Natural Gas Management Plan

Items VI-VIII

# VI. Separation Equipment: Attach a complete description of how Operator will size separation equipment to optimize gas capture.

Data from surrounding wells is used to generate type curves which provides the basis for expected gas rates during initial production, peak production and then the natural decline.

Separation equipment will be sized to provide adequate separation for peak production.

• Facility design includes multiple stages of separation to minimize gas waste. Wells flow through a a 3-phase separator to remove gas. Gas from the 3 Phase separators are then sent through a gas scrubber before being

route to treatment and/or sales.

 Industry standard sizing calculations are used for gas-liquid separation and liquid-liquid separation.

# VII. Operational Practices: Attach a complete description of the actions Operator will take to comply with the requirements of Subsection A through F 19.15.27.8 NMAC.

Drilling, completion and production setup

is designed to minimize the waste of natural gas and

to flare instead of vent.

Drilling Operations:

 $_{\odot}$  Natural gas encountered will be flared instead of vented unless there is an equipment malfunction and/or to avoid risking safety or the environment.

 $\circ\,$  Flares will be properly sized and placed

at least 100' from the nearest surface hole on

the pad.

Completions/Recompletions Operations:

 $\,\circ\,$  Flowback operations will not commence until connected to a properly sized gas gathering system.

 $\circ\,$  During initial flowback wells are routed to the separation equipment as soon as technically feasible to minimize gas waste.

 $\circ \text{ During}$ 

separation flowback wells are routed to the separation equipment to minimize gas waste.

 $\circ\,$  Gas sales is maximized. Gas will be flared instead of vented during an emergency or malfunction to avoid posing a risk to operations or personnel safety.

 $\,\circ\,$  Flares are properly sized with a continuous pilot.

Production Operations:

 $\circ\,$  Gas sales will be maximized. Gas will be flared instead of vented during an emergency or malfunction to avoid posing a risk to operations or personnel safety.

•

 $_{\odot}$  After a well is stabilized from liquid unloading, the well will be turned back into the collection system.

#### Performance

Standards:

 $\circ$  The facility will be designed to handle peak production rates and pressures.

• All tanks will have automatic gauging equipment.

 $\circ\,$  Flares will be designed to ensure proper combustion and will have continuous pilots. Flares will be located 100' from nearest surface hole on the pad and storage tanks.

 $\circ\,$  Weekly AVOs will be performed, and any leaking thief hatches will be cleaned and properly re-sealed.

#### • Measurement and Calibration:

 $_{\odot}$  All volume that is flared and vented that is not measured will be estimated.

 $_{\odot}$  When metering is not practical due to low pressure/rate, all vented or flared volumes will be estimated.

• Measurement will conform to industry standards. Measurement will not be bypassed except for purposes of inspection or

calibration.

# VIII. Best Management Practices: Attach a complete description of Operator's best management practices to minimize venting during active and planned maintenance.

• Venting will be minimized during active and planned maintenance.

 Systems and equipment requiring maintenance will be isolated and blown down to sales and then flare before

any remaining gas is vented in an effort to minimize waste and venting.

Downhole maintenance will use best management practices to minimize vent.