District 1 1625 N. French Dr., Hobbs, NM 88240 District II 811 S. First St., Artesia, NM 88210 District III 1000 Rio Brazos Road, Aztec, NM 87410 District IV 1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico REC Energy, Minerals and Natural Resources Department

Submit Original to Appropriate District Office

Oil Conservation Division DEC **2 6 2019** 1220 South St. Francis Dr. Santa Fe, NM 87505 DISTRICT/LABUESIAOCD

GAS CAPTURE PLAN

Date: <u>06/21</u> /19

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Original

Devon & OGRID No.: Devon Energy Prod Co., LP (6137)

Amended - Reason for Amendment:

This Gas Capture Plan outlines actions to be taken by the Devon to reduce well/production facility flaring/venting for new completion (new drill, recomplete to new zone, re-frac) activity.

Note: Form C-129 must be submitted and approved prior to exceeding 60 days allowed by Rule (Subsection A of 19.15.18.12 NMAC).

Well(s)/Production Facility – Name of facility

Well Name Well Location Expected Flared/ API Footages Comments (ULSTR) MĊF/D Vented Papa Fritas 27-22 Fed Com 333H Sec. 27, T23S. 150 FSL, 822 FEL Papa Fritas 27 CTB 2 R29E Papa Fritas 27-22 Fed Com 623H Sec. 27, T23S. 150 FSL, 762 FEL Papa Fritas 27 CTB 2 R29E Papa Fritas 27-22 Fed Com 713H Sec. 27, T23S, 150 FSL, 792 FEL Papa Fritas 27 CTB 2 R29E

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

Gathering System and Pipeline Notification

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 <u>DCP</u> system at that time. Based on current information, it is <u>Devon's</u> 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