State of New Mexico Energy, Minerals and Natural Resources Department

OCD - HOBBS **Oil Conservation Division** 1220 South St. Francis Dr. Santa Fe, NM 87505

GAS CAPTURE PLAN

Date: 07/02/2018

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Operator & OGRID No.: Kaiser-Francis Oil Company, 12361

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□ Amended - Reason for Amendment:

This Gas Capture Plan outlines actions to be taken by the Operator 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 API Footages Expected Flared or Comments (ULSTR) MCF/D Vented Red Hills 206H 31-25S-33E 300 FNL 1095 FEL 1500 0 Red Hills 706H 31-25S-33E 300 FNL 1115 FEL 2500 0 Red Hills 006H 31-25S-33E 300 FNL 1075 FEL 1500 0 Red Hills 506H 31-25S-33E 300 FNL 1035 FEL 2500 0 2500 0 Red Hills 406H 31-25S-33E 300 FNL 1015 FEL 30-025-47185 31-25S-33E 300 FNL 995 FEL 2500 0 Red Hills 606H 0 Red Hills 106H 31-25S-33E 300 FNL 1055 FEL 2500

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

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 Mark West and will be connected to Mark West low/high pressure gathering system located in Lea County, New Mexico. Kaiser-Francis Oil Company provides (periodically) to Mark West an drilling, completion and estimated first production date for wells that are scheduled to be drilled in the foreseeable future. In addition, Kaiser-Francis Oil Company and Mark West have periodic conference calls to discuss changes to drilling and completion schedules. Gas from these wells will be processed at Mark West Processing Plant. 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 Mark West system at that time. Based on current information, it is Kaiser-Francis Oil Company'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