

District I
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
Energy, Minerals and Natural Resources Department

Submit Original
to Appropriate
District Office

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

OCD – HOBBS
11/18/2020
RECEIVED

GAS CAPTURE PLAN

Date: 11/18/2020

Original Operator & OGRID No.: Franklin Mountain Energy, LLC 373910
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

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

Well Name	API	Well Location (ULSTR)	Footages	Expected MCF/D	Flared or Vented	Comments
LHS Wildcat Fed Com 604H	TBD	P-36-25S-35E	250 FSL 523 FEL	1100 +/-	Flared	New well; expect to tie-in at IP
LHS Wildcat Fed Com 705H	TBD 30-025-48106	P-36-25S-35E	250 FSL 488 FEL	1100 +/-	Flared	New well; expect to tie-in at IP

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 Energy Transfer Company and will be connected to Energy Transfer Company's gathering system located in Lea County, New Mexico. It will require 6,000' of pipeline to connect the facility to low/high pressure gathering system. Franklin Mountain Energy, LLC provides (periodically) to Energy Transfer Company a drilling, completion and estimated first production date for wells that are scheduled to be drilled in the foreseeable future. In addition, Franklin Mountain Energy, LLC and Energy Transfer Company have periodic conference calls to discuss changes to drilling and completion schedules. Gas from these wells will be processed at Energy Transfer Company's Keystone Gas Processing Facility located in Sec.5, Block B-2, Kermit, Winkler Co., Texas. 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 permanent central tank battery and gas will be sold or flared. Gas sales should start as soon as the wells start producing gas unless there are operational issues on Energy Transfer Company's system at that time. Based on current information, it is Franklin Mountain Energy'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