

Date Issued: August 18, 2021	Lucid Artesia Company	New Mexico Oil Conservation Division Title 19- Natural Resources & Wildlife Chapter 15 - Oil & Gas Part 28 - Natural Gas Gathering Systems
Revision Dates:		Gas Management Plan

1. Plan: To minimize the venting and flaring of natural gas from Lucid Artesia Company (Lucid) owned and operated facilities. This is to be done in order to prevent waste and to provide a level of safety for those who work and/or live in the vicinity of our underground pipeline facilities, to protect the general health of the public, and to protect the environment.

For facilities constructed after May 25, 2021, these facilities shall be designed to minimize waste.

Lucid has an obligation to minimize waste and shall resolve emergencies as quickly and safely as feasible.

2. Scope: This Gas Management Plan applies to the gas gathering operations of Lucid Artesia Company (Lucid) and is intended to meet the requirements set forth by the New Mexico Oil Conservation Commission Title 19, Chapter 15, Part 28 – Natural Gas Gathering Systems. Known hereafter in this plan as Rule 28.

2.1. Effective Date of NMOCD Part 28. May 25, 2021

2.2. Lucid Gas Management Plan Effective Date: On or before August 23, 2021

2.3. Responsibilities

1. EHSR Department

1.1 Comply with NMOCD Rule 28.

1.2 NMOCD - Notification of venting or flaring event.

1.3 NMOCD - Monthly report of vented and flared natural gas.

1.4 NMOCD - GIS digitally formatted as-built map. Updated as-built map as needed.

1.5 NMOCD – Updated Operations Plan no later than March 31st of following year.

1.6 In conjunction with Pipeline Operations Department perform an annual monitoring of the gathering system.

2. Pipeline Operations Department

2.1. Comply with NMOCD Rule 28.

2.2. AVO Inspections.

2.3. Report to affected upstream operators.

2.4. Measurement or estimation of vented and/or flared natural gas.

2.5. Notification to EHSR Department of vented or flared natural gas – measured or estimated.

2.6. Notification to GIS Department of vented or flared natural gas. To include GPS coordinates, date and volume of each emergency, malfunction and release reported to NMOCD.

2.7. Identify, Quantify, Rectify. (IQR) As needed or as applicable, each compressor station will have an IQR performed by an independent entity to analyze station efficiency in order to minimize waste.

2.8. In conjunction with EHSR Department perform an annual monitoring of the gathering system.

3. Accounting Department

4.1 NMOCD – Beginning in CY 2023, no later than February 28 a Report certifying compliance with statewide gas capture requirements.

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3. Definitions: Terms shall have the means specified in Part 28 unless otherwise noted.

- A. **ALARM** means advanced leak and repair monitoring technology for detecting natural gas leaks or releases that are not required by applicable state or federal law, rule, or regulation and which the NMOCD has approved as eligible to earn a credit against the reported volume of lost natural gas pursuant to Paragraph (3) of Subsection B of 19.15.28.10
- B. **AVO** means audio, visual and olfactory.
- C. **Custody Transfer Point** means the transfer of natural gas from upstream separation, processing, treatment, or in-field gathering to a pipeline or any other form of transportation occurring at sales metering equipment.
- D. **Emergency** means a temporary, infrequent, and unavoidable event in which the loss of natural gas is uncontrollable or necessary to avoid a risk of an immediate and substantial adverse impact on safety, public health or the environment, but does not include an event arising from or related to:
- E. **Flare or Flaring** means the controlled combustion of natural gas in a device designed for that purpose.
- F. **Flare Stack** means a device equipped with a burner used to flare natural gas.
- G. **Gathering Pipeline** means a pipeline that gathers natural gas within a natural gas gathering system.
- H. **GIS** means geographic information system.
- I. **GPS** means global positioning system.
- J. **Malfunction** means a sudden, unavoidable failure or breakdown of equipment beyond the reasonable control of Lucid that substantially disrupts operations but does not include a failure or breakdown that is caused entirely or in part by poor maintenance, careless operation, or other preventable equipment failure or breakdown.
- K. **Natural Gas** means a gaseous mixture of hydrocarbon compounds, primarily composed of methane, and includes both casinghead gas and gas as those terms are defined in 19.15.2 NMAC.
- L. **Natural Gas Gathering System** means the gathering pipelines and associated facilities that compress, dehydrate or treat natural gas after the custody transfer point and ending at the connection point with a natural gas processing plant or transmission or distribution system *or point of offload where custody transfer occurs.*
- M. **New Gathering Pipeline** means a gathering pipeline placed into service after May25,2021.
- N. **Vent or Venting** means the release of uncombusted natural gas to the atmosphere.

4. Lucid Gas Management Plan.

- A. **Venting or flaring of natural gas from a natural gas gathering system that constitutes waste as defined in 19.15.2 NMAC is prohibited. Lucid has a general duty to maximize the gathering of natural gas by minimizing the waste of natural gas through venting and flaring.**
- B. **Lucid shall take all reasonable actions to prevent and minimize leaks and releases of natural gas from our gathering system and shall implement the following Gas Management Plan to minimize the waste of natural gas.**
 - 4.1 In all circumstances, Lucid shall flare rather than vent natural gas except when flaring is technically

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infeasible or would pose a risk to safe operations or personnel safety and venting is a safer alternative than flaring. **Lucid shall not flare or vent natural gas except:**

- 4.1.1 During an emergency or malfunction; or
- 4.2.1 During the following activities unless prohibited by applicable state and federal law, Rule, or Regulation for the emission of hydrocarbons and volatile organic compounds (VOC's):
 - 1. **Repair and Maintenance** including the blowing down and depressurizing equipment to perform repair or maintenance.
 - 2. **Normal Operation** of a gas-activated pneumatic controller or pump.
 - 3. **Normal Operation** of dehydration units and amine treatment units.
 - 4. **Normal Operation** of compressors, compressor engines, and turbines.
 - 5. **Normal Operation** of valves, flanges and connectors that are not the result of inadequate equipment design or maintenance.
 - 6. **Normal Operations** of a storage tank or other low-pressure production vessel, but not including venting from a thief hatch that is not properly closed or maintained on an established schedule.
 - 7. **Loading out Liquids** from a storage tank or other low-pressure vessel to transport vehicle
 - 8. **Gauging or Sampling** a storage tank or other low-pressure vessel.
 - 9. **Blow Down** to repair a gathering pipeline.
 - 10. **Pigging** a gathering pipeline.
 - 11. **Purging** a gathering pipeline.
 - 12. **Commissioning of Pipelines**, equipment, or facilities only for as long as necessary to purge introduced impurities from the pipeline or equipment

4.2 Natural Gas Gathering Systems

- 4.2.1. During scheduled maintenance, replacement, or repair of a new or existing natural gas gathering system, Lucid shall not vent natural gas during blowdown and shall route natural gas to a portable flare stack which complies with the flare stack standards, inspection, and recordkeeping requirement is Subsection E of 19.15.27.8 NMAC
- 4.2.2. During unscheduled maintenance, replacement or repair of a new or existing natural gas gathering system, to the extent that it is technically feasible and would not pose a risk to safe operations or personnel safety, Lucid shall not vent natural gas during blowdown and shall route natural gas to a portable flare stack which complies with 4.2.1

4.3 Audio, Visual, Olfactory (AVO) Inspections. Lucid shall conduct at a minimum a weekly inspection of compressors, dehydrators and treatment facilities associated with our natural gas gathering system to confirm those components are operating properly and there are no leaks or releases except as allowed in 4.1.1 or 4.2.1.

4.4 Reporting to Affected Upstream Operators.

- 4.4.1. No less than 14 days prior to the date of scheduled maintenance, replacement or repair of a

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natural gas gathering system, Lucid shall provide written notification to each upstream operator whose natural gas is gathered by the system. Notification shall include the date and expected duration of downtime where no natural gas will be gathered.

4.4.2. As soon as possible but no more than 12 hours after discovery of an emergency or malfunction, or the need for unscheduled maintenance of a natural gas gathering system, Lucid shall provide verbal notification to each upstream operator whose gas is gathered by the system. Notifications shall include the date and expected duration of downtime. Lucid will then provide written confirmation of the verbal notification to include the date, time, person and telephone number to whom the verbal notification was given. This is to occur no later than 24 hours after initial discovery.

4.4.3. Lucid shall make and keep a record of each notification for no less than five years and make such records available for inspection by the NMOCD upon request.

4.5 Measurement or Estimation of Vented and Flared Natural Gas.

4.5.1. Lucid shall measure or estimate the volume of natural gas that it vents, flares or beneficially uses regardless of the reason or authorization for such venting or flaring.

4.5.2. Lucid shall install equipment to measure the volume of natural gas flared from a natural gas gathering system.

4.5.3. Measuring equipment shall conform to an industry standard such as API Manual of Petroleum Measurement Standards Chapter 14.10 – Measurement of Flow to Flares.

4.5.4. Measuring equipment shall not be designed or equipped with a manifold that allows the diversion of natural gas around the metering element except for the sole purpose of inspecting and servicing the measurement equipment.

4.5.5. If metering is not practicable due to circumstances such as low flow rate or low pressure venting and flaring, Lucid shall estimate the volume of vented or flared natural gas using a methodology that can be independently verified.

4.6 Reporting of Vented or Flared Natural Gas Caused by an Emergency, Malfunction or of Long Durations

4.6.1. Lucid shall notify the NMOCD of venting or flaring that exceeds 50 MCF in volume and either results from an emergency or malfunction or lasts eight hours or more cumulatively within any 24-hour period from a single event by filing a Form C-129 in lieu of a Form C-141.

Exceptions: Lucid shall file a Form C-141 instead of a Form C-129 for a release that includes liquid during venting or flaring that is or may be a major or minor release.

4.6.1.1. For venting or flaring that equals or exceeds 50 MCF but is less than 500 MCF from a single event, notify NMOCD in writing by filing a Form C-129 no later than 15 days following discovery or commencement of venting or flaring. Or

4.6.1.2. For venting or flaring that equals or exceeds 500 MCF or otherwise qualifies as a major release as defined in 19.15.29.7 NMAC from a single event, notify the division verbally or by e-mail as soon as possible and no later than 24 hours following discovery or commencement of venting or flaring and provide the information required in form C-129. In addition, no

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later than 15 days following the discovery or commencement of venting or flaring, Lucid shall file a form C-129 that verifies, updates or corrects the verbal or email notification. And

4.6.1.3. No later than 15 days following the termination of venting or flaring, Lucid shall notify NMOCD by filing an additional Form C-129. At the request of the NMOCD, Lucid shall provide and certify additional information by a “specified” date.

At present, the Form C-129 can only be accessed when submitting a report; however, Lucid shall provide and certify the accuracy of the following information in the Form C-129

1. Operators Name
2. Name and Type of Facility
3. Equipment Involved
4. Compositional Analysis of vented or flared natural gas that is representative of the natural gas gathering system
5. Date(s) and Time(s) that venting or flaring was discovered or commenced and terminated
6. Measured or Estimated Volume of vented or flared gas
7. Cause and Nature of venting or flaring
8. Steps taken to limit the duration and magnitude of venting or flaring
9. Corrective actions taken to eliminate the cause and recurrence of venting or flaring.

4.7 Monthly Reporting of Vented and Flared Natural Gas

4.7.1. For each natural gas gathering system at which venting or flaring occurred, Lucid shall separately report the volume of vented gas and the volume of flared gas for each month in each category listed below. Beginning on October 1, 2021, Lucid shall gather data for quarterly reports in a format specified by NMOCD.

- On February 15, 2022, Lucid will file a Report for the Fourth Quarter of 2021
- On May 15, 2022, Lucid will file a Report for the First Quarter of 2022
- Beginning April 2022, Lucid shall submit a Form C-115B monthly on or before the 15th day of the second month following the month in which it vented or flared natural gas. In the Report, Lucid shall specify whether it estimated or measured each reported volume. In filing the initial Report, Lucid shall provide the methodology (measured or estimated using calculations and industry standard factors) used to report the volumes on the C-115B Form and shall report changes in the methodology on future forms. Lucid shall make and keep records of the measurements and estimates, including records showing how it calculated the estimates; for no less than five years and make such records available for inspection by the NMOCD upon request.

The Categories are as follows:

1. Emergency
2. Non-Scheduled maintenance or malfunction including abnormal operations of equipment
3. Routine repair and maintenance including blowdown and depressurization
4. Beneficial use including pilot and purge gas, fired equipment and engines
5. Gathering pipeline blowdown, purging, and pigging
6. Storage Tanks

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- 7. Venting as a result of normal operation of pneumatic controllers and pumps
- 8. Improperly closed or maintained thief hatches
- 9. Other surface waste as defined in Subparagraph (1) of Paragraph (b) of Subsection W of 19.15.2.7 NMAC that is not described above.
- 4.7.2. Upon submittal of the C-115B Report, the NMOCD will compile and publish on the division’s website – Lucid’s vented and flared natural gas information for each month on a volumetric and gas capture percentage basis.
 - 4.7.2.1. To calculate the lost natural gas on a volumetric basis, Lucid shall deduct the volume of natural gas used for beneficial use and vented or flared during an emergency or vented as a result of normal operation of pneumatic controllers and pumps from the volume of natural gas gathered reported on its Form C-115B.
 - 4.7.2.2. To calculate the natural gas captured on a percentage basis, Lucid shall deduct the volume of lost gas calculated in 4.7.1.1 from the total volume of natural gas gathered and divide by the total volume of natural gas gathered.
- 4.7.3. Upon the New Mexico Environment Department’s request, Lucid shall promptly provide a copy of any form filed pursuant to 19.15.28 NMAC.

4.8 GIS Location Reporting Requirements

- 4.8.1. Lucid shall file with the NMOCD a GIS digitally formatted as-built map.
 - 4.8.1.1. For a new gathering pipeline or natural gas gathering system, no later than 90 days after placing the gathering pipeline or system into service.
 - 4.8.1.2. For an existing gathering pipeline or natural gas gathering system no later than 90 days after May 25, 2021.
 - 4.8.1.3. For an addition to an existing gathering pipeline or natural gas gathering system, no later than 90 days after placing the addition into service.
- 4.8.2. To ensure proper field identification of a gathering pipeline in an emergency, the as-built map shall include a layer which identifies the pipeline size and construction material type.
- 4.8.3. No later than July 1st of each Calendar Year, Lucid shall file with the NMOCD an updated GIS digitally formatted as-built map of its gathering pipeline or natural gas gathering system, which shall include a GIS layer that identifies the date, location and volume of vented or flared natural gas of each emergency, malfunction and release reported to the NMOCD since Rule 28 became applicable to the pipeline or system.
- 4.8.4. Lucid may assert confidentiality for the GIS digitally formatted as-built map and GIS layer pursuant to Section 71-2-8 NMSA 1978.

4.9 Annual Pipeline System Monitoring

Lucid shall perform an annual monitoring of the entire length of a gathering pipeline using an Audio-Visual - Olfactory Technique, ALARM Technology, Aerial Visual Inspections, or other valid method to detect leaks and releases. Lucid shall record and upon the NMOCD’s request, report the date and time of the monitoring, the method and technology used. Lucid shall retain records of

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monitoring for at least five years. Personnel conducting the inspections shall be knowledgeable on the methods and technology being used.

4.10 Pipeline Integrity Management Maintenance Program

Lucid’s Integrity Management Maintenance Program is proprietary. Lucid is in the process of inputting all the gathering lines into the Program. Once completed, and based on the criteria listed below, each pipeline will be given a risk assessment. The risk assessment will determine the pigging and chemical treatment schedule for each pipeline in the system. Until the Program is complete, Lucid maintains a pigging and chemical program based on a number of factors: length, diameter, operating pressure, regulatory oversight, etc.

Length	Operating Pressure	Critical Degree of Incline	CO ₂ %	H ₂ S PPM	DOT	Road Crossing
Diameter	Temperature	Points Above Critical Angle	CO ₂ Partial Pressure	H ₂ S Partial Pressure	Trunkline/Lateral	Water Crossing
Wall Thickness	Type of Flow	Maximum Critical Angle	CO ₂ Level of Concern	H ₂ S Level of Concern		Rail Crossing
Volume	Gas Velocity	Specific Gravity	Gas Density	Consequence Zone High – Medium - No		Piggable

4.11 Pipeline Cathodic Protection

Lucid’s Cathodic Protection Program is based on and follows the guidelines set forth in *Appendix D – Criteria for Cathodic Protection and Determination of Measurements* – found in 49CFR Part 192 Transportation of Natural and Other Gas by Pipeline. The procedures contained within the Program prescribe the minimum requirements for protecting buried metallic pipelines from external corrosion in conformance with applicable codes, accepted industry practices and Lucid specifications. External corrosion control procedures, including those for designing, installing, operating, and maintaining cathodic protection systems are carried out by or under the direction of persons qualified in pipeline corrosion control methods.

4.11.1. Pipeline Cathodic Protection Surveys. Pipelines in the system are surveyed based on their order of importance subject to the following criteria.

1. Jurisdictional Status
2. High Pressure
3. Low Pressure

5. Overview of Gathering Operations.

Lucid Artesia Company operates approximately 957 miles of pipeline in southeast New Mexico. Counties of operation are Eddy, and Chaves These lines are predominately gas gathering and range in diameter from 4” to 16”. There are 6 compressor stations in this system. Each station has a low-pressure side (consisting of poly-pipe and steel) which is the upstream/suction side of each compressor station and a high-pressure side which consists of steel pipe only on the downstream/discharge side of each compressor station. These high-pressure lines currently feed 4 different points of high-pressure offload.

The gathering system is continuously monitored by Lucid’s Supervisory Command and Data Acquisition (SCADA) System.

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5.1. Summit Offload

5.1.1. Normally 2 Compressor Stations which gather sweet natural gas and feeds a Summit owned and operated pipeline.

5.2. DCP Shadow Offload

5.2.1. Normally 1 Compressor Station which gathers sour natural gas and feeds a DCP owned and operated pipeline.

5.3. Transwestern Atoka 3 Offload

5.3.1. Normally 1 Compressor Station which gather sour natural gas and feed the Red Hills AGI Processing Facility.

5.4. Transwestern Buffalo Valley Offload. 1 Compressor Station which gathers sweet natural gas and feeds a Transwestern owned and operated pipeline.

5.5. Each compressor station is equipped with tanks equipped to accommodate low pressure pipeline liquids handling. All tanks are equipped with overflow containment which are designed to hold 1.5 times their rated capacity. All tanks are equipped with a PVRV (relief valve). The set pressure is set below the pressure rating of the tank. All tanks are equipped with a thief hatch which has been set to relieve above the set pressure of the PVRV.

6. Emergency Response

Each notification of a verified or possible leak on a pipeline system requires an immediate response. All actions taken by Lucid emergency response personnel shall be directed towards protecting people first, property and the environment. Lucid considers all leaks or releases to be an immediate response event. Employees will notify their appropriate Field Operation’s Manager who will then also notify the Sr. Director of Operations.

6.1. Condition Recognition – Appropriate Response

- Verify the Event: If a leak has been verified and could possibly be a threat to any homes or business in the area. Personnel are required to notify 911 if they have not already been called or are not already on scene.
- Shut down and isolate the pipeline (and related facilities if warranted) – consider the blow-down of the pipeline following procedures set forth in the Gas Management Plan
- Communicate with supervisor(s), Manager(s) and peers for assistance
- Contact the MIS Control Room for possible assistance in monitoring pressure or flow rates, communication with appropriate facilities or to open or close isolation valves remotely if the capability exists.

7. Damage Prevention

Excavation damage remains a leading cause of pipeline accidents. The result of these accidents are fatalities, injuries, product released (methane generally) and damage to infrastructure. Lucid has been a member of the New Mexico 811 System since 1995 and follows a Damage Prevention Program. The purpose of the Program is to provide a level of safety for those who work and/or live in the vicinity of Lucid’s underground pipeline facilities, to protect the environment and to protect our vital interest. The Damage Prevention Program in its entirety can be found in either Procedure 192-L6 or 195-F19.

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In addition, Lucid utilizes the following measures to minimize excavation damage to our pipelines.

- Pipeline Markers. These markers indicate the pipeline’s approximate location, product being transported and Lucid’s 24-hour contact number.
- Every excavated crossing of a Lucid underground facility requires a Positive Response on the 811 One Call Ticket with the following script.

This Lucid Energy Critical Infrastructure Pipeline is marked with pin flags. Arrangements must be made in advance with a Lucid Representative before excavation occurs, call... A Lucid Representative must be present during any excavation, road bore, pull through of a line being installed, backfill and padding. Potholing must be done by hand or hydrovac; Lucid requires a 3’x3’x3’ window of clearance. In addition, the excavator’s bucket must have a protective bar across the teeth (sissy bar, butter bar, etc.) Excavation must be performed parallel to the pipeline so as not to reach over or towards the pipeline. You must cross at no less than a 45-degree angle to the Lucid Pipeline. A spotter is required and must be able to clearly communicate with the Lucid Representative. As per New Mexico Excavation Law, violators will be reported to the NM Pipeline Safety Bureau.

- Every excavated crossing of a Lucid underground facility requires a warning sign be posted at the excavation site. The Excavator Warning Sign must be photographed and have GPS and time stamp capabilities. The Excavator Warning Sign reads as follows.
*Lucid Energy Group. **STOP! Critical Infrastructure Pipeline.** By New Mexico Law a representative from Lucid Energy must be notified and present when ANY excavation is to occur on or within 15’ of a Lucid Energy Right-Of-Way. Violators will be reported to the New Mexico Pipeline Safety Bureau for prosecution. The sign also contains the same information written in Spanish.*
- Every excavated crossing of a Lucid underground facility requires a “Lucid Foreign Line Crossing Check List” to be filled out by the appropriate excavator and witnessed by a Lucid representative.

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 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

QUESTIONS

Action 42859

QUESTIONS

Operator: Lucid Artesia Company 201 S. Fourth Street Artesia, NM 88210	OGRID: 147831
	Action Number: 42859
	Action Type: [NGGS] NGGS Operations Plan (NGGS-OP)

QUESTIONS

Verification	
Does the operator own the selected facility	Yes
Is the selected facility a natural gas gathering system	Yes

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 1625 N. French Dr., Hobbs, NM 88240
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 811 S. First St., Artesia, NM 88210
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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

ACKNOWLEDGMENTS

Action 42859

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ACKNOWLEDGMENTS

I certify that, after reasonable inquiry, the statements in and attached to this Natural Gas Gathering System Operations 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.