Form C-101

August 1, 2011 Permit 297776

50270

Shaffer

<u>District I</u> 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

1220 S. St Francis Dr., Santa Fe, NM 87505 Phone:(505) 476-3470 Fax:(505) 476-3462

PENASCO DRAW;SA-YESO (ASSOC)

State of New Mexico Energy, Minerals and Natural Resources Oil Conservation Division 1220 S. St Francis Dr. Santa Fe, NM 87505

1 Operator Non	Operator Name and Address 2. OGRID Number												
		2. UGR	328947										
	r Energy Partners 5 Katy Freeway	LLC							0. 4.01				
									3. API	Number	_		
Hou	ston, TX 77024									30-015-48642	2		
4. Property Cod	e		Proper	rty Name					6. Well No.				
331	156			ROSE SOUTH					010H				
					7. Su	rface Location							
UL - Lot	Section	Township	R	ange	Lot Idn	Feet From	N/S Line	Feet From		E/W Line	County		
L	7	198	i	26E	3	2260	S	70	0	W		Eddy	
	8. Proposed Bottom Hole Location												
UL - Lot	Section	Township		Range	Lot Idn	Feet From	N/S Line	Feet From		E/W Line	County		
	12		S	25E		2430	S		50	W	1	Eddy	

9. Pool Information

Additional Well Information									
11. Work Type New Well	12. Well Type OIL	13. Cable/Rotary	14. Lease Type Private	15. Ground Level Elevation 3384					
16. Multiple	17. Proposed Depth	18. Formation	19. Contractor	20. Spud Date					

Depth to Ground water Distance from nearest fresh water well Distance to nearest surface water

5

Phone: 832-930-8613

We will be using a closed-loop system in lieu of lined pits

Double Ram

6/29/2021

Date:

21. Proposed Casing and Cement Program

Type	Hole Size	Casing Size	Casing Weight/ft	Setting Depth	Sacks of Cement	Estimated TOC
Surf	12.25	9.625	36	1300	438	0
Prod	8.75	7	32	3100	1399	0
Prod	8.75	5.5	20	8535	1399	0

Casing/Cement Program: Additional Comments

	22. Proposed Blowout Preve	ntion Program							
Type Working Pressure Test Pressure Manufacturer									

5000

Conditions of Approval Attached

knowledge and	I have complied with 19.15.14.9 (A) NMAC ⊠ and/or 19.15.14.9 (B) NMAC		OIL CONSER	RVATION DIVISION
Printed Name:	Electronically filed by Sarah Chapman	Approved By:	Kurt Simmons	
Title: Regulatory Director		Title:	Petroleum Specialist -	A
Email Address: schapman@spurepllc.com		Approved Date:	7/2/2021	Expiration Date: 7/2/2023

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

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

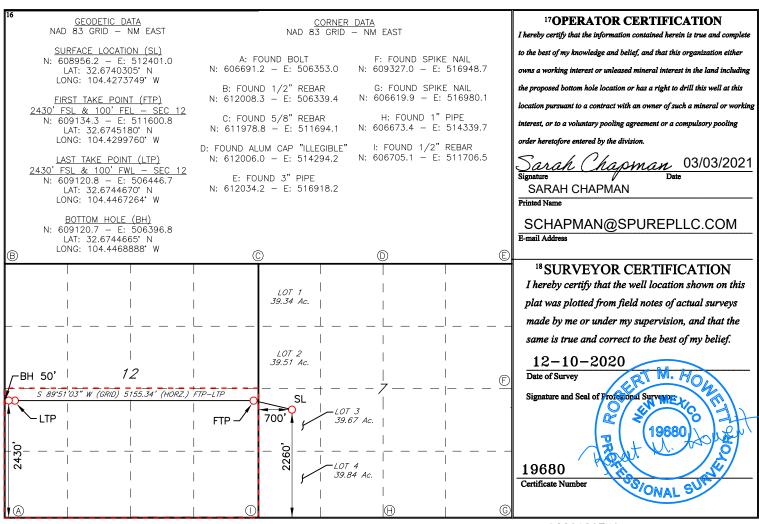
☐ AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT

:	1 API Numbe	er 2Pool Code 3Pool Name									
3	30-015-			50270)	PENASCO DRAW; SA-YESO (ASSOC)					
⁴ Property Co	ry Code 5 Property Name							6 Well Number			
		ROSE SOUTH								10H	
7OGRID	NO.	8 Operator Name							9Elevation		
3289	947	SPUR ENERGY PARTNERS LLC.								3384'	
¹⁰ Surface Location											
UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet From the	East/We	est line	County	
3	7	198	26E		2260	SOUTH	700	WE:	ST	EDDY	

	¹¹ Bottom Hole Location If Different From Surface										
UL or lot no.	Section	Township	p Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County		
L	12	19S	25E		2430	SOUTH	50	WEST	EDDY		
12 Dedicated Acres	13 Joint	or Infill	14 Consolidation	Code 15	5 Order No.						
320											

No allowable will be assigned to this completion until all interest have been consolidated or a non-standard unit has been approved by the division.



LS20120749

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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**

Form APD Comments

Permit 297776

PERMIT COMMENTS

Operator Name and Address:	API Number:
Spur Energy Partners LLC [328947]	30-015-48642
9655 Katy Freeway	Well:
Houston, TX 77024	ROSE SOUTH #010H

Created By	Comment	Comment Date
schapman01	Approved NSL attached for your use.	6/29/2021

Form APD Conditions

Permit 297776

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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:
Spur Energy Partners LLC [328947]	30-015-48642
9655 Katy Freeway	Well:
Houston, TX 77024	ROSE SOUTH #010H

OCD Reviewer	Condition
ksimmons	Notify OCD 24 hours prior to casing & cement
ksimmons	Will require a File As Drilled C-102 and a Directional Survey with the C-104
ksimmons	The Operator is to notify NMOCD by sundry (Form C-103) within ten (10) days of the well being spud
kpickford	Will require a administrative order for non-standard location prior to placing the well on production
kpickford	Once the well is spud, to prevent ground water contamination through whole or partial conduits from the surface, the operator shall drill without interruption through the fresh water zone or zones and shall immediately set in cement the water protection string
kpickford	Cement is required to circulate on both surface and intermediate1 strings of casing
kpickford	Oil base muds are not to be used until fresh water zones are cased and cemented providing isolation from the oil or diesel. This includes synthetic oils. Oil based mud, drilling fluids and solids must be contained in a steel closed loop system

1. Geologic Formations

Formation	Depth	Lithology	Expected Fluids
Quaternary	0'	Dolomite, other: Caliche	Useable Water
Top San Andres	915'	Dolomite, Limestone	Natural Gas, Oil
Lower San Andres	1950'	Dolomite, Limestone	Natural Gas, Oil
Glorieta	2460'	Dolomite, Siltstone	Natural Gas, Oil
Top Yeso	2575'	Dolomite	Natural Gas, Oil
Base Yeso 4150'		Dolomite	Natural Gas, Oil

^{*}H2S, water flows, loss of circulation, abnormal pressures, etc.

2. Casing Program

Primary Plan:

All casing strings will be tested in accordance with Onshore Oil and Gas Order #2 III.B.1.h

Holo Size (in)	Casing 2	Interval	Csg. Size	Weight	Grade	Conn.	SF	SF Burst	Body SF	Joint SF
Hole Size (in)	From (ft)	To (ft)	(in)	(lbs)	Graue	Collii	Collapse	or duist	Tension	Tension
12.25	0	1300	9.625	36	J-55	BTC	1.125	1.2	1.4	1.4
8.75	0	3100	7	32	L-80	BK-HT	1.125	1.2	1.4	1.4
8.75	3100	8535	5.5	20	L-80	BK-HT	1.125	1.2	1.4	1.4
								SF Values will 1	meet or Exceed	

	Y or N
Is casing new? If used, attach certification as required in Onshore Order #1	Y
Does casing meet API specifications? If no, attach casing specification sheet.	Y
Is premium or uncommon casing planned? If yes attach casing specification sheet.	N
Does the above casing design meet or exceed BLM's minimum standards? If not provide justification (loading assumptions, casing design criteria).	Y
Will the intermediate pipe be kept at a minimum 1/3 fluid filled to avoid approaching the collapse pressure rating of the casing?	Y
Is well located within Capitan Reef?	N
If yes, does production casing cement tie back a minimum of 50' above the Reef?	
Is well within the designated 4 string boundary.	
Is well located in SOPA but not in R-111-P?	N
If yes, are the first 2 strings cemented to surface and 3 rd string cement tied back 500' into previous casing?	
Is well located in R-111-P and SOPA?	N
If yes, are the first three strings cemented to surface?	
Is 2 nd string set 100' to 600' below the base of salt?	
Is well located in high Cave/Karst?	N
If yes, are there two strings cemented to surface?	
(For 2 string wells) If yes, is there a contingency casing if lost circulation occurs?	
Is well located in critical Cave/Karst?	N
If yes, are there three strings cemented to surface?	

3. Cementing Program

Primary Plan:

Casing String	Top (ft)	Bottom (ft)	% Excess
Surface (Lead)	0	950	100%
Surface (Tail)	950	1300	165%
Production (Lead)	0	2100	0%
Production (Tail)	2100	8535	50%

Casing String	# Sks	Wt.	Yld (ft3/sack)	H20 (gal/sk)	500# Comp. Strength (hours)	Slurry Description
		(ID/gai)	(IIJ/Sack)	(gai/sk)	(Hours)	
Surface (Lead)	270	12.2	2.31	13.48	8:12	Clas C Premium Plus Cement
Surface (Tail)	168	13.2	1.84	9.92	6:59	Clas C Premium Plus Cement
Production (Lead)	133	11.8	2.54	15.29	N/A	Clas C Premium Plus Cement
Production (Tail)	1266	13.2	1.81	9.81	N/A	Clas C Premium Plus Cement

4. Pressure Control Equipment

BOP installed and tested before drilling which hole?	Size?	Min. Required WP	Туре	~	Tested	l to:
		5M	Annular	✓	70% of w	Ü
12.25" Hole	13-5/8"		Blind Ram Pipe Ram ✓ Double Ram			
12.25 Hole	13-3/8	5M			250 pgi / 5	250 psi / 5000 psi
		JIVI			230 psi / 3	
			Other*			
		5M	Annular	✓	70% of w	Ü
8.75" Hole	13-5/8"		Blind Ram ✓ Pipe Ram ✓			
	13-3/8	5M			250 pgi / 5	:000 mai
		SIVI	Double Ran	n	250 psi / 5	ooo psi
			Other*			

Spur Energy Partners LLC will be utilizing a 5M BOP Stack

Condition	Specify what type and where?
BH Pressure at deepest TVD	1303 psi
Abnormal Temperature	No
BH Temperature at deepest TVD	103°F

^{*}Specify if additional ram is utilized.

BOP/BOPE will be tested by an independent service company to 250 psi low and the high pressure indicated above per Onshore Order 2 requirements. The System may be upgraded to a higher pressure but still tested to the working pressure listed in the table above. If the system is upgraded all the components installed will be functional and tested.

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. Other accessories to the BOP equipment will include a Kelly cock and floor safety valve (inside BOP) and choke lines and choke manifold. See attached schematics.

Formation integrity test will be performed per Onshore Order #2.

On Exploratory wells or on that portion of any well approved for a 5M BOPE system or greater, a pressure integrity test of each casing shoe shall be performed. Will be tested in accordance with Onshore Oil and Gas Order #2 III.B.1.i.

Y Are anchors required by manufacturer?

A conventional wellhead system will be employed. The wellhead and connection to the BOPE will meet all API 6A requirements. The BOP will be tested per Onshore Order #2 after installation on the surface casing which will cover testing requirements for a maximum of 30 days.

See attached schematics.

5. BOP Break Testing Request

Spur Energy Partners LLC requests permission to adjust the BOP break testing requirements as per the verbal agreement reached over the phone between SPUR/BLM on September 7, 2020. A separate sundry will be sent prior to spud that reflects the pad-based break testing plan.

BOP break test under the following conditions:

- After a full BOP test is conducted
- When skidding to drill the production section, where the surface casing point is shallower than the 3 Bone Spring or 10,000 TVD.
- When skidding to drill a production section that does not penetrate the 3rd Bone Spring or deeper.

If the kill line is broken prior to skid, four tests will be performed.

- 1) The void between the wellhead and the spool (this consists of two tests)
- 2) The spool between the kill lines and the choke manifold (this consists of two tests)

If the kill line is not broken prior to skid, two tests will be performed.

1) The void between the wellhead and the pipe rams

6. Mud Program

Sufficient mud materials to maintain mud properties and meet minimum lost circulation and weight increase requirements will be kept on location at all times. The following is a general list of products: Barite, Bentonite, Gypsum, Lime, Soda Ash, Caustic Soda, Nut Plug, Cedar Fiber, Cotton Seed Hulls, Drilling Paper, Salt Water Clay, CACL2. Spur will use a closed mud system.

Depth		Trmo	Weight	Viscosity	Water Loss	
From (ft)	To (ft)	Туре	(ppg)	viscosity	water Loss	
0	1300	Water-Based Mud	8.6-8.9	32-36	N/C	
1300	8535	Water-Based Mud	8.6-8.9	32-36	N/C	

7. Logging and Testing Procedures

Logg	Logging, Coring and Testing.						
Yes	Will run GR from TD t	o surface (horizontal well – vertical p	ortion of hole). Stated logs				
	run will be in the Comp	pletion Report and submitted to the B	LM.				
No	Logs are planned based	on well control or offset log informa	tion.				
No	Drill stem test? If yes, explain						
No	Coring? If yes, explain						
Addi	tional logs planned	Interval					
No	Resistivity						
No	Density						
No	CBL						
Yes	Mud log	SCP - TD					
No	DEV						

8. Drilling Conditions

Pump high viscosity sweeps as needed for hole cleaning. The mud system will be monitored visually/manually as well as with an electronic PVT. The necessary mud products for additional weight and fluid loss control will be on location at all times. Appropriately weighted mud will be used to isolate potential gas, oil, and water zones until such time as casing can be cemented into place for zonal isolation.

Hyd	rogen Sulfide (H2S) monitors will be installed prior to drilling out the surface shoe. If						
H2S	H2S is detected in concentrations greater than 100 ppm, the operator will comply with the						
prov	provisions of Onshore Oil and Gas Order #6. If Hydrogen Sulfide is encountered, measured						
valu	values and formations will be provided to the BLM.						
N	H2S is present						
Y	H2S Plan attached						

Total estimated cuttings volume: 824.3 bbls.

9. Other facets of operation

	Yes/No
Will more than one drilling rig be used for drilling operations? If yes, describe.	Yes
Spur Energy Partners LLC. requests the option to contract a Surface Rig to drill,	
set surface casing, and cement for this well. If the timing between rigs is such that	
Spur Energy Partners LLC. would not be able to preset surface, the Primary Rig	
will MIRU and drill the well in its entirety per the APD. Please see the attached	
document for information on the spudder rig.	

Attachments

- _x__ Directional Plan
- _x__ H2S Contingency Plan
- _x__ Akita 57 Attachments
- _x__ Transcend Spudder Rig Attachments
- _x__ BOP Schematics

10. Company Personnel

<u>Name</u>	<u>Title</u>	Office Phone	Mobile Phone
Christopher Hollis	Drilling Manager	832-930-8629	713-380-7754
Johnny Nabors	Senior Vice President Operations	832-930-8502	281-904-8811

8/19/2015 9:44:40 AM

MECHANICAL PROPERTIES	Pipe	втс	LTC	STC	
Minimum Yield Strength	55,000				psi
Maximum Yield Strength	80,000				psi
Minimum Tensile Strength	75,000				psi
DIMENSIONS	Pipe	втс	LTC	STC	
Outside Diameter	9.625	10.625	10.625	10.625	in.
Wall Thickness	0.352				in.
Inside Diameter	8.921	8.921	8.921	8.921	in.
Standard Drift	8.765	8.765	8.765	8.765	in.
Alternate Drift					in.
Nominal Linear Weight, T&C	36.00				lbs/ft
Plain End Weight	34.89				lbs/ft
PERFORMANCE	Pipe	втс	LTC	sтс	
Minimum Collapse Pressure	2,020	2,020	2,020	2,020	psi
Minimum Internal Yield Pressure	3,520	3,520	3,520	3,520	psi
Minimum Pipe Body Yield Strength	564,000				Ibs
Joint Strength		639	453	394	Ibs
Reference Length		11,835	8,389	7,288	ft
MAKE-UP DATA	Pipe	втс	LTC	STC	
Make-Up Loss		4.81	4.75	3.38	in.
Minimum Make-Up Torque			3,400	2,960	ft-lbs
Maximum Make-Up Torque			5,660	4,930	ft-lbs

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> U. S. Steel Tubular Products 10343 Sam Houston Park Dr., #120 connections@uss.com Houston, TX 77064

1-877-893-9461 www.usstubular.com



Keeping You Connected.

Precision Connections BK-HT

7 in. 32 lb/ft HC-L80 with 7.875 in. Coupling OD



Pipe	Body
------	------

Nominal OD	7.000	inches
Nominal Weight	32.00	lb/ft
Wall Thickness	0.453	inches
Plain End Weight	31.67	lb/ft
Drift	6.000	inches
Nominal ID	6.094	inches
Grade	HC-L80	
Min Yield	80,000	lbf/in²
Min Tensile	95,000	lbf/in²
Critical Section Area	9.317	in²
Pipe Body Yield Strength	745	kips
Min Internal Yield Pressure	9,060	psi
Collapse Pressure	9,290	psi

Connection

Coupling OD	7.875	inches
Coupling Length	9.000	inches
Make Up Loss	4.500	inches
Critical Section Area	11.859	in²
Internal Pressure Rating	100%	
External Pressure Rating	100%	
Tension Efficiency	100%	
Connection Strength	745	kips
Compression Efficiency	100%	
Uniaxial Bend Rating	46.5	° / 100 ft
Min Make Up Torque	9,250	ft-lbs 👖
Yield Torque	35,650	ft-lbs 🚺

v1.2

7/26/2018

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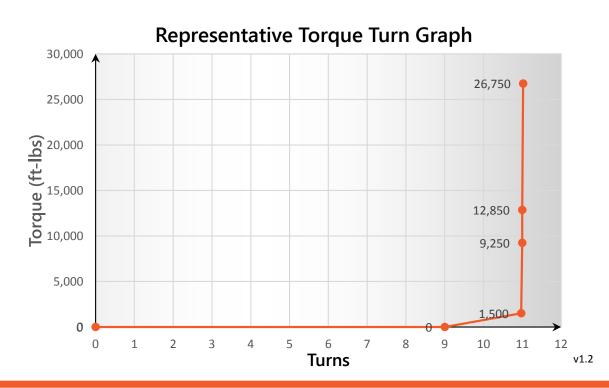
7/26/2018

Keeping You Connected.

Torque Data Sheet - Precision Connections BK-HT

7 in. 32 lb/ft HC-L80 with 7.875 in. Coupling OD

Min Make Up Torque	9,250	ft-lbs	Max Operating Torque	30,300	ft-lbs
Max Make Up Torque	26,750	ft-lbs	Yield Torque	35,650	ft-lbs
Optimum Torque	12,850	ft-lbs			



Pipe Body

Collapse Pressure



Keeping You Connected.

Precision Connections BK-HT 5.5 in. 20 lb/ft HC-L80 with 6.3 in. Coupling OD



'		
Nominal OD	5.500	inches
Nominal Weight	20.00	lb/ft
Wall Thickness	0.361	inches
Plain End Weight	19.81	lb/ft
Drift	4.653	inches
Nominal ID	4.778	inches
Grade	HC-L80	
Min Yield	80,000	lbf/in²
Min Tensile	95,000	lbf/in²
Critical Section Area	5.828	in²
Pipe Body Yield Strength	466	kips
Min Internal Yield Pressure	9,190	psi

9,490

psi

onnection		
Coupling OD	6.300	inches
Coupling Length	8.250	inches
Make Up Loss	4.125	inches
Critical Section Area	8.456	in²
Internal Pressure Rating	100%	
External Pressure Rating	100%	
Tension Efficiency	100%	
Connection Strength	466	kips
Compression Efficiency	100%	
Uniaxial Bend Rating	58.2	° / 100 ft
Min Make Up Torque	6,050	ft-lbs 👖
Yield Torque	23,250	ft-lbs 🚺

v1.2

7/26/2018

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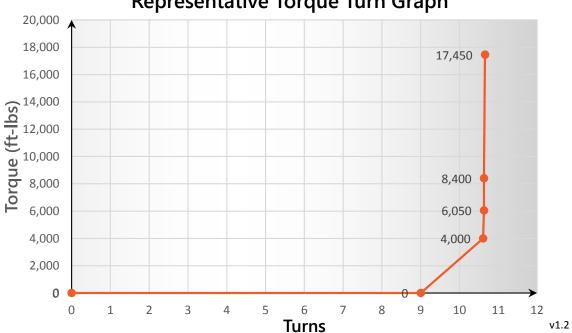
Torque Data Sheet - Precision Connections BK-HT

5.5 in. 20 lb/ft HC-L80 with 6.3 in. Coupling OD

ft-lbs Min Make Up Torque 6,050 Max Operating Torque 19,800 ft-lbs Yield Torque Max Make Up Torque 17,450 ft-lbs 23,250 ft-lbs

Optimum Torque ft-lbs 8,400

Representative Torque Turn Graph



7/26/2018



Spur Energy Partners, LLC

Eddy County, NM (NAD 83 - NME) ROSE SOUTH #10H

Wellbore #1

Plan: PLAN #1

Standard Planning Report

24 June, 2021







WBDS SQL 2 Database:

Company: Spur Energy Partners, LLC Project: Eddy County, NM (NAD 83 - NME)

ROSE SOUTH Site: Well: #10H Wellbore: Wellbore #1 Design: PLAN #1

Local Co-ordinate Reference:

TVD Reference: MD Reference: North Reference:

Survey Calculation Method:

Well#10H

RKB = 20' @ 3404.00usft (AKITA 57) RKB = 20' @ 3404.00usft (AKITA 57)

Minimum Curvature

Project Eddy County, NM (NAD 83 - NME)

Map System: US State Plane 1983 Geo Datum: Map Zone:

North American Datum 1983 New Mexico Eastern Zone

System Datum:

Mean Sea Level

Site **ROSE SOUTH**

607,781.50 usft Northing: 32.6708016 Site Position: Latitude: Мар -104.4273627 From: Easting: 512,403.70 usft Longitude: -0.051 **Position Uncertainty:** 0.00 usft Slot Radius: 13.200 in **Grid Convergence:**

Well #10H

Well Position +N/-S 1.174.70 usft 608,956.20 usft 32.6740305 Northing: Latitude: -2.70 usft -104.4273749 +E/-W Easting: 512,401.00 usft Longitude:

Position Uncertainty 0.00 usft Wellhead Elevation: Ground Level: 3,384.00 usft

Wellbore #1 Wellbore

Declination Field Strength Magnetics **Model Name** Sample Date **Dip Angle** (°) (°) (nT) 6/24/2021 IGRF2020 6.973 60.180 47.667.64485588

Design PLAN #1

Audit Notes:

Version: Phase: **PLAN** Tie On Depth: 0.00

Vertical Section: Depth From (TVD) +N/-S +E/-W Direction (usft) (usft) (usft) (°) 0.00 269.85 0.00 0.00

Date 6/24/2021 **Plan Survey Tool Program**

Depth From Depth To

(usft) (usft) Survey (Wellbore) **Tool Name** Remarks

0.00 MWD+IGRE 8,535.88 PLAN #1 (Wellbore #1)

OWSG MWD + IGRF or WN

Plan Sections Vertical Build Measured Dogleg Turn Depth Inclination **Azimuth** Depth +N/-S +E/-W Rate Rate Rate **TFO** (usft) (usft) (usft) (°/100ft) (°/100ft) (°/100ft) (°) (°) (usft) **Target** (°) 0.00 0.00 0.00 0.00 0.000 0.00 0.00 0.00 0.00 0.00 300.00 0.00 0.00 300.00 0.00 0.00 0.00 0.00 0.00 0.000 733.94 8.68 49.05 732.28 21.50 24.77 2.00 2.00 0.00 49.049 1.715.44 8.68 49.05 1.702.54 118.57 136.63 0.00 0.00 0.00 0.000 60.00 2,638.26 179.31 -336.11 6.00 4.62 -12.52 -141.969 2,827.30 269.85 3,027.30 -509.32 0.00 60.00 269.85 2,738.26 178.86 0.00 0.00 0.000 178.10 10.00 0.000 PLAT #10H FTP: 24 3,331.71 90 44 269.85 2,815.00 -800.20 10.00 0.00 8,485.98 90.44 269.85 2,775.38 164.63 -5,954.30 0.00 0.00 0.00 0.000 PLAT #10H LTP: 24 -6,004.20 8,535.88 90.44 269.85 2,775.00 164.50 0.00 0.00 0.00 0.000 PLAT #10H BHL: 24





Database: Company: Project: WBDS_SQL_2

Spur Energy Partners, LLC

Eddy County, NM (NAD 83 - NME) ROSE SOUTH

Site: ROSE SOUTH #10H Wellbore: Wellbore #1 PLAN #1

Local Co-ordinate Reference:

TVD Reference: MD Reference: North Reference:

Survey Calculation Method:

Well#10H

RKB = 20' @ 3404.00usft (AKITA 57)

RKB = 20' @ 3404.00usft (AKITA 57)

Grid

Minimum Curvature

Planned Survey									
Measured Depth (usft)	Inclination (°)	Azimuth (°)	Vertical Depth (usft)	+N/-S (usft)	+E/-W (usft)	Vertical Section (usft)	Dogleg Rate (°/100ft)	Build Rate (°/100ft)	Turn Rate (°/100ft)
0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
100.00	0.00	0.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00
200.00	0.00	0.00	200.00	0.00	0.00	0.00	0.00	0.00	0.00
300.00	0.00	0.00	300.00	0.00	0.00	0.00	0.00	0.00	0.00
400.00	2.00	49.05	399.98	1.14	1.32	-1.32	2.00	2.00	0.00
500.00	4.00	49.05	499.84	4.57	5.27	-5.28	2.00	2.00	0.00
	6.00	49.05	599.45	10.29		-3.26 -11.88	2.00	2.00	0.00
600.00				10.29	11.85			2.00	
700.00	8.00	49.05	698.70	18.27	21.06	-21.10	2.00	2.00	0.00
733.94	8.68	49.05	732.28	21.50	24.77	-24.83	2.00	2.00	0.00
800.00	8.68	49.05	797.59	28.03	32.30	-32.38	0.00	0.00	0.00
900.00	8.68	49.05	896.44	37.92	43.70	-43.80	0.00	0.00	0.00
1,000.00	8.68	49.05	995.30	47.81	55.10	-55.22	0.00	0.00	0.00
1,100.00	8.68	49.05	1,094.15	57.70	66.49	-66.64	0.00	0.00	0.00
1,200.00	8.68	49.05	1,193.01	67.59	77.89	-78.07	0.00	0.00	0.00
1,300.00	8.68	49.05	1,291.86	77.48	89.29	-89.49	0.00	0.00	0.00
•			,						
1,400.00	8.68	49.05	1,390.72	87.37	100.68	-100.91	0.00	0.00	0.00
1,500.00	8.68	49.05	1,489.57	97.26	112.08	-112.33	0.00	0.00	0.00
1,600.00	8.68	49.05	1,588.43	107.15	123.48	-123.76	0.00	0.00	0.00
1,700.00	8.68	49.05	1,687.28	117.04	134.87	-135.18	0.00	0.00	0.00
1,715.44	8.68	49.05	1,702.54	118.57	136.63	-136.94	0.00	0.00	0.00
1,750.00	7.16	38.75	1,736.78	121.96	139.95	-140.27	6.00	-4.40	-29.81
1,800.00	5.62	15.27	1,786.47	126.75	142.55	-142.88	6.00	-3.07	-46.96
1,850.00	5.47	343.88	1,836.25	131.41	142.53	-142.87	6.00	-0.30	-62.77
1,900.00	6.80	318.34	1,885.97	135.91	139.90	-140.26	6.00	2.65	-51.09
1,950.00	8.97	303.04	1,935.50	140.24	134.67	-135.03	6.00	4.34	-30.59
2,000.00	11.51	294.04	1,984.70	144.40	126.84	-127.22	6.00	5.09	-18.00
2,050.00	14.24	288.35	2,033.44	148.37	116.45	-116.84	6.00	5.45	-11.38
2,100.00	17.05	284.48	2,081.59	152.14	103.51	-103.91	6.00	5.63	-7.74
2,150.00	19.92	281.69	2,129.00	155.70	88.07	-88.48	6.00	5.73	-7.74 -5.58
	22.82								
2,200.00		279.58	2,175.56	159.04	70.17	-70.58	6.00	5.80	-4.22
2,250.00	25.74	277.93	2,221.14	162.15	49.85	-50.27	6.00	5.84	-3.31
2,300.00	28.68	276.59	2,265.60	165.03	27.17	-27.61	6.00	5.87	-2.68
2,350.00	31.62	275.48	2,308.83	167.66	2.20	-2.64	6.00	5.90	-2.22
2,400.00	34.58	274.54	2,350.71	170.03	-25.00	24.55	6.00	5.91	-1.87
2,450.00	37.54	273.74	2,391.13	172.15	-54.35	53.90	6.00	5.92	-1.61
*			·						
2,500.00	40.51	273.03	2,429.96	174.00	-85.78	85.32	6.00	5.93	-1.41
2,550.00	43.48	272.41	2,467.12	175.59	-119.19	118.73	6.00	5.94	-1.25
2,600.00	46.46	271.85	2,502.49	176.90	-154.50	154.03	6.00	5.95	-1.12
2,650.00	49.43	271.35	2,535.98	177.93	-191.60	191.13	6.00	5.95	-1.01
2,700.00	52.41	270.88	2,567.50	178.68	-230.40	229.93	6.00	5.96	-0.93
2,750.00	55.39	270.45	2,596.95	179.15	-270.80	270.33	6.00	5.96	-0.85
2,800.00	58.37	270.06	2,624.27	179.33	-312.67	312.20	6.00	5.96	-0.80
2,827.30	60.00	269.85	2,638.26	179.31	-336.11	335.64	6.00	5.96	-0.76
2,900.00	60.00	269.85	2,674.60	179.15	-399.07	398.60	0.00	0.00	0.00
3,000.00	60.00	269.85	2,724.60	178.92	-485.67	485.20	0.00	0.00	0.00
3,027.30	60.00	269.85	2,738.26	178.86	-509.32	508.85	0.00	0.00	0.00
3,050.00	62.27	269.85	2,749.21	178.81	-529.19	528.73	10.00	10.00	0.00
3,100.00	67.27	269.85	2,770.52	178.69	-574.41	573.94	10.00	10.00	0.00
3,150.00	72.27	269.85	2,787.80	178.57	-621.31	620.84	10.00	10.00	0.00
3,200.00	77.27	269.85	2,800.93	178.44	-669.54	669.07	10.00	10.00	0.00
3,250.00	82.27	269.85	2,809.81	178.31	-718.73	718.26	10.00	10.00	0.00
3,300.00	87.27	269.85	2,814.37	178.18	-716.73 -768.50	768.04	10.00	10.00	0.00
3,331.71	90.44	269.85	2,815.00	178.10	-800.20	799.73	10.00	10.00	0.00
3,400.00		269.85		176.10			0.00	0.00	0.00
3,400.00	90.44	209.00	2,814.48	111.92	-868.49	868.02	0.00	0.00	0.00





Database: Company: Project:

Site:

WBDS_SQL_2

Spur Energy Partners, LLC Eddy County, NM (NAD 83 - NME)

ROSE SOUTH

Well: #10H
Wellbore: Wellbore #1
Design: PLAN #1

Local Co-ordinate Reference:

TVD Reference: MD Reference: North Reference:

Survey Calculation Method:

Well#10H

RKB = 20' @ 3404.00usft (AKITA 57)

RKB = 20' @ 3404.00usft (AKITA 57)

Grid

Minimum Curvature

Planned Survey									
Measured Depth (usft)	Inclination (°)	Azimuth (°)	Vertical Depth (usft)	+N/-S (usft)	+E/-W (usft)	Vertical Section (usft)	Dogleg Rate (°/100ft)	Build Rate (°/100ft)	Turn Rate (°/100ft)
3,500.00	90.44	269.85	2,813.71	177.66	-968.49	968.02	0.00	0.00	0.00
3,600.00 3,700.00 3,800.00 3,900.00 4,000.00	90.44 90.44 90.44 90.44	269.85 269.85 269.85 269.85 269.85	2,812.94 2,812.17 2,811.40 2,810.63 2,809.86	177.40 177.14 176.88 176.61 176.35	-1,068.49 -1,168.48 -1,268.48 -1,368.48 -1,468.47	1,068.02 1,168.01 1,268.01 1,368.01 1,468.01	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00
4,100.00 4,200.00 4,300.00 4,400.00 4,500.00	90.44 90.44 90.44 90.44	269.85 269.85 269.85 269.85 269.85	2,809.09 2,808.33 2,807.56 2,806.79 2,806.02	176.09 175.83 175.57 175.31 175.05	-1,568.47 -1,668.47 -1,768.46 -1,868.46 -1,968.46	1,568.00 1,668.00 1,768.00 1,867.99 1,967.99	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00
4,600.00 4,700.00 4,800.00 4,900.00 5,000.00	90.44 90.44 90.44 90.44	269.85 269.85 269.85 269.85 269.85	2,805.25 2,804.48 2,803.71 2,802.95 2,802.18	174.79 174.52 174.26 174.00 173.74	-2,068.45 -2,168.45 -2,268.45 -2,368.44 -2,468.44	2,067.99 2,167.98 2,267.98 2,367.98 2,467.98	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00
5,100.00 5,200.00 5,300.00 5,400.00 5,500.00	90.44 90.44 90.44 90.44	269.85 269.85 269.85 269.85 269.85	2,801.41 2,800.64 2,799.87 2,799.10 2,798.33	173.48 173.22 172.96 172.69 172.43	-2,568.44 -2,668.43 -2,768.43 -2,868.43 -2,968.42	2,567.97 2,667.97 2,767.97 2,867.96 2,967.96	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00
5,600.00 5,700.00 5,800.00 5,900.00 6,000.00	90.44 90.44 90.44 90.44	269.85 269.85 269.85 269.85 269.85	2,797.57 2,796.80 2,796.03 2,795.26 2,794.49	172.17 171.91 171.65 171.39 171.13	-3,068.42 -3,168.42 -3,268.41 -3,368.41 -3,468.41	3,067.96 3,167.96 3,267.95 3,367.95 3,467.95	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00
6,100.00 6,200.00 6,300.00 6,400.00 6,500.00	90.44 90.44 90.44 90.44	269.85 269.85 269.85 269.85 269.85	2,793.72 2,792.95 2,792.19 2,791.42 2,790.65	170.87 170.60 170.34 170.08 169.82	-3,568.40 -3,668.40 -3,768.40 -3,868.39 -3,968.39	3,567.94 3,667.94 3,767.94 3,867.93 3,967.93	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00
6,600.00 6,700.00 6,800.00 6,900.00 7,000.00	90.44 90.44 90.44 90.44	269.85 269.85 269.85 269.85 269.85	2,789.88 2,789.11 2,788.34 2,787.57 2,786.81	169.56 169.30 169.04 168.78 168.51	-4,068.39 -4,168.38 -4,268.38 -4,368.38 -4,468.37	4,067.93 4,167.93 4,267.92 4,367.92 4,467.92	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00
7,100.00 7,200.00 7,300.00 7,400.00 7,500.00	90.44 90.44 90.44 90.44	269.85 269.85 269.85 269.85 269.85	2,786.04 2,785.27 2,784.50 2,783.73 2,782.96	168.25 167.99 167.73 167.47 167.21	-4,568.37 -4,668.37 -4,768.36 -4,868.36 -4,968.36	4,567.91 4,667.91 4,767.91 4,867.91 4,967.90	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00
7,600.00 7,700.00 7,800.00 7,900.00 8,000.00	90.44 90.44 90.44 90.44 90.44	269.85 269.85 269.85 269.85 269.85	2,782.19 2,781.42 2,780.66 2,779.89 2,779.12	166.95 166.68 166.42 166.16 165.90	-5,068.35 -5,168.35 -5,268.35 -5,368.34 -5,468.34	5,067.90 5,167.90 5,267.89 5,367.89 5,467.89	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00
8,100.00 8,200.00 8,300.00 8,400.00 8,485.98	90.44 90.44 90.44 90.44	269.85 269.85 269.85 269.85 269.85	2,778.35 2,777.58 2,776.81 2,776.04 2,775.38	165.64 165.38 165.12 164.86 164.63	-5,568.34 -5,668.33 -5,768.33 -5,868.33 -5,954.30	5,567.88 5,667.88 5,767.88 5,867.88 5,953.85	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00
8,500.00 8,535.88	90.44 90.44	269.85 269.85	2,775.28 2,775.00	164.59 164.50	-5,968.32 -6,004.20	5,967.87 6,003.75	0.00 0.00	0.00 0.00	0.00 0.00





Database: WBDS_SQL_2

Company: Spur Energy Partners, LLC
Project: Eddy County, NM (NAD 83 - NME)

Site: ROSE SOUTH

Well: #10H
Wellbore: Wellbore #1
Design: PLAN #1

Local Co-ordinate Reference:

TVD Reference: MD Reference: North Reference:

Survey Calculation Method:

Well#10H

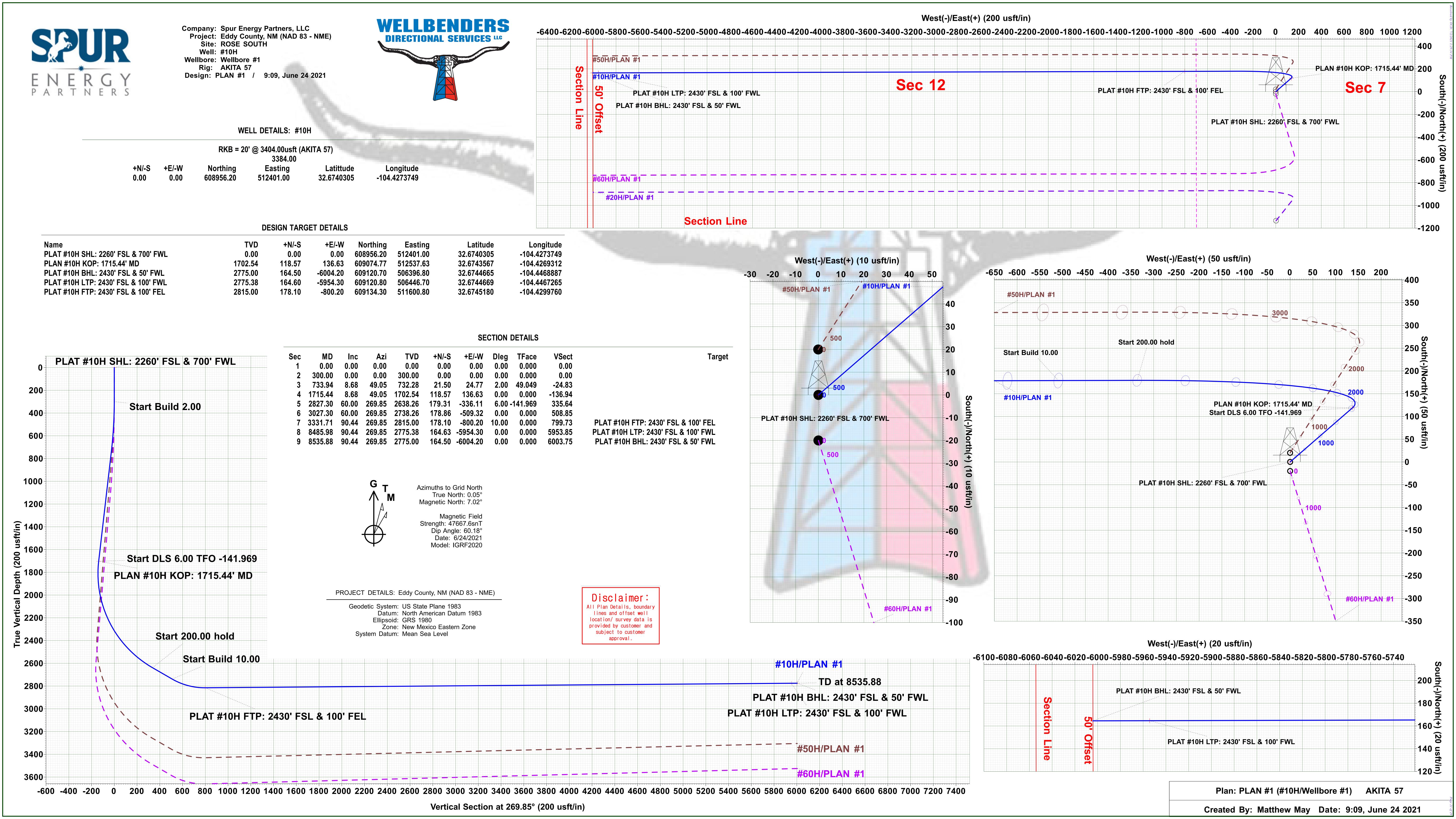
RKB = 20' @ 3404.00usft (AKITA 57)

RKB = 20' @ 3404.00usft (AKITA 57)

Grid

Minimum Curvature

Design Targets									
Target Name - hit/miss target Dip - Shape	Angle (°)	Dip Dir. (°)	TVD (usft)	+N/-S (usft)	+E/-W (usft)	Northing (usft)	Easting (usft)	Latitude	Longitude
PLAT #10H SHL: 226 - plan hits target cente - Point	0.00 er	0.00	0.00	0.00	0.00	608,956.20	512,401.00	32.6740305	-104.4273749
PLAN #10H KOP: 171 - plan hits target cente - Point	0.00 er	0.00	1,702.54	118.57	136.63	609,074.77	512,537.63	32.6743567	-104.4269312
PLAT #10H BHL: 2430 - plan hits target center - Point	0.00 er	0.00	2,775.00	164.50	-6,004.20	609,120.70	506,396.80	32.6744665	-104.4468887
PLAT #10H LTP: 2430 - plan misses target co - Point	0.00 enter by (2,775.38 8485.98usf	164.60 t MD (2775.	-5,954.30 38 TVD, 164.	609,120.80 .63 N, -5954.30 E	506,446.70	32.6744669	-104.4467265
PLAT #10H FTP: 243(- plan hits target cente - Point	0.00 er	360.00	2,815.00	178.10	-800.20	609,134.30	511,600.80	32.6745180	-104.4299760





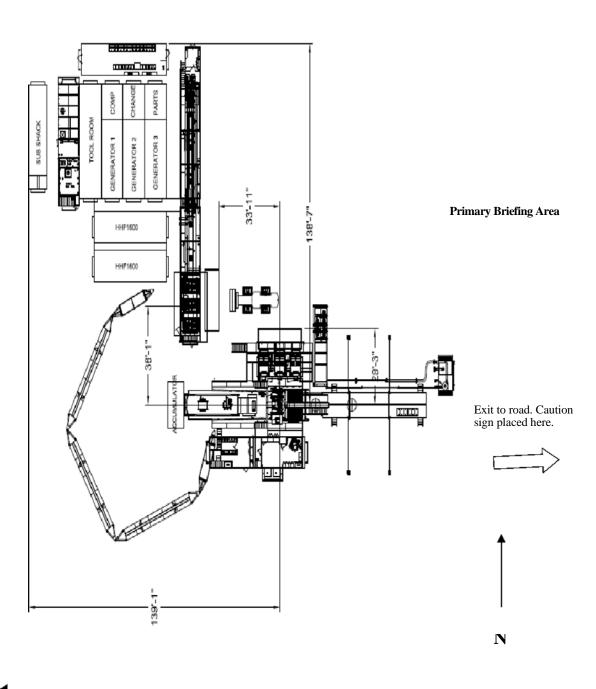
Permian Drilling Hydrogen Sulfide Drilling Operations Plan Rose South 10H

Open drill site. No homes or buildings are near the proposed location.

1. Escape

Personnel shall escape upwind of wellbore in the event of an emergency gas release. Escape can take place through the lease road on the Southeast side of the location. Personnel need to move to a safe distance and block the entrance to location. If the primary route is not an option due to the wind direction, then a secondary egress route should be taken.

Secondary Briefing Area





WIND: Prevailing winds are from the <u>Southwest</u>



State of New Mexico Energy, Minerals and Natural Resources Department

Submit Electronically Via E-permitting

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

NATURAL GAS MANAGEMENT PLAN

This Natural Gas Management Plan must be submitted with each Application for Permit to Drill (APD) for a new or recompleted well.

Section 1 – Plan Description Effective May 25, 2021

I. Operator: SPU	R ENERGY F	ARTNERS LLC	_OGRID:	328947	Date:	06 / 2	22 / 2021		
II. Type: ⋈ Original	☐ Amendment	due to □ 19.15.27.9	.D(6)(a) NMA(C □ 19.15.27.9.D(6)(b) NMAC □	Other.			
If Other, please describ	e:								
III. Well(s): Provide the recompleted from a					vells proposed to	be drill	led or proposed to		
Well Name	API	ULSTR	Footages	Anticipated Oil BBL/D	Anticipated Gas MCF/D		Anticipated oduced Water		
ROSE SOUTH 10H		3-7-19S-26E	2260' FSL 700' FWL	457 BBL/D	475 MCF/D		9 BBL/D		
ROSE SOUTH 50H		3-7-19S-26E	2280' FSL 700' FWL	356 BBL/D	556 MCF/D	178	2 BBL/D		
V. Anticipated Schedu	IV. Central Delivery Point Name:ROSE SOUTH CTB [See 19.15.27.9(D)(1) NMAC] V. Anticipated Schedule: Provide the following information for each new or recompleted well or set of wells proposed to be drilled or proposed to be recompleted from a single well pad or connected to a central delivery point. Well Name								
			08/23/2021	09/29/2021	10/18/2		10/18/2021		
ROSE SOUTH 50H O8/24/2021 O8/31/2021 O9/29/2021 10/18/2021 O9/29/2021 10/18/2021 VI. Separation Equipment: Attach a complete description of how Operator will size separation equipment to optimize gas capture. VII. Operational Practices: Attach a complete description of the actions Operator will take to comply with the requirements of Subsection A through F of 19.15.27.8 NMAC. VIII. Best Management Practices: Attach a complete description of Operator's best management practices to minimize venting during active and planned maintenance.									

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.

Operator certifies that it is not required to complete this section because Operator is in compliance with its statewide natural gas capture requirement for 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	Available Maximum Daily Capacity
			Start Date	of System Segment Tie-in

XI. Map. 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 \square wi	ill □ will not have	capacity to gather	100% of the anticipated	l natural gas
production volume from the well	prior to the date of first prod	duction.			

XIII. Line Pressure. Operator \square does \square does not anticipate that its existing well	ell(s) connected to the same segment, or portion, of the
natural gas gathering system(s) described above will continue to meet anticipated	

\neg	A 44 1 4	O 4 9	1 .		1 4	•	4 41	1.1"	
	- Апаси (Operator	s blan i	ro manage	production	in response	to the increa	sed line press	ure

XIV. Confidentiality: \Box Operator asserts confidentiality pursuant to Section 71-2-8 NMSA 1978 for the information	on 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 speci-	fic information
for which confidentiality is asserted and the basis for such assertion.	

Section 3 - Certifications Effective May 25, 2021

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

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; compression on lease; (c) (d) liquids removal on lease; reinjection for underground storage; (e) **(f)** reinjection for temporary storage; (g) reinjection for enhanced oil recovery; fuel cell production; and (h)

Section 4 - Notices

1. If, at any time after Operator submits this Natural Gas Management Plan and before the well is spud:

other alternative beneficial uses approved by the division.

- (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: Sarah Chapman
Printed Name: SARAH CHAPMAN
Title: REGULATORY DIRECTOR
E-mail Address: SCHAPMAN@SPUREPLLC.COM
Date: 06/22/2021
Phone: 832-930-8613
OIL CONSERVATION DIVISION
(Only applicable when submitted as a standalone form)
Approved By:
Title:
Approval Date:
Conditions of Approval:



Natural Gas Management Plan – Attachment

VI. Separation equipment will be sized by construction engineering staff based on anticipated daily production to ensure adequate capacity.

VII. Spur Energy Partners LLC ("Spur") will take the following actions to comply with the regulations listed in 19.15.27.8:

- A. Spur will maximize the recovery of natural gas by minimizing waste, as defined by 19.15.2 NMAC, of natural gas through venting and flaring. Spur will ensure that our wells will be connected to a natural gas gathering system with sufficient capacity to transport natural gas.
- B. All drilling operations will be equipped with a rig flare at least 100 feet from the nearest surface hole location. Rig flare will be utilized to combust any natural gas that is brought to surface during normal operations. In the case of emergency, flaring volumes will be reported appropriately.
- C. During completion operations any natural gas brought to surface will be flared. Immediately following completion operations, wells will flow to permanent separation equipment. Produced natural gas from separation equipment will be sent to sales. If natural gas does not meet gathering pipeline specifications, Spur will flare for 60 days or until natural gas meets the pipeline specifications. Spur will ensure flare is properly sized and is equipped with an automatic igniter or continuous pilot. Gas samples will be taken twice per week and natural gas will be routed into a gathering system as soon as the pipeline specifications are met.
- D. Natural gas will not be flared with the exception of 19.15.27.8(D)(1-4). If there is no adequate takeaway for the separator gas, wells will be shut-in until that natural gas gathering system is available with exception of emergency or malfunction situations. Volumes will be reported appropriately.
- E. Spur will comply with performance standards pursuant to 19.15.27.8(E)(1-8). All equipment will be designed and sized to handle maximum pressures to minimize waste. Storage tanks constructed after May 25, 2021 will be equipped with an automatic gauging system that reduces venting of natural gas. Flare stacks installed or replaced after May 25, 2021 will be equipped with an automatic ignitor or continuous pilot. Spur will conduct AVO inspections as described in 19.15.27.8(E)(5)(a) with frequencies specified in 19.15.27.8(E)(5)(b) and (c). All emergencies or malfunctions will be resolved as quickly and safely as possible to minimize waste.
- F. The volume of natural gas that is vented or flared as the result of an emergency or malfunction during drilling and/or completion operations will be estimated and reported accordingly. The volume of natural gas that is vented, flared or beneficially used during production operations, will be measured and reported accordingly. Spur will install equipment to measure the volume of natural gas flared from existing piping or a flowline piped from equipment such as high-pressure separators, heater treaters, or VRUs associated with a well or facility associated with a well authorized by an APD after May 25, 2021 that has an average daily production of less than 60,000 cubic feet of natural gas. If metering is not practicable due to circumstances such as low flow rate or low pressure venting or flaring, Spur will estimate the volume of flared or vented natural gas. Measuring equipment will conform to industry standards and will not be equipped with a manifold



that allows the diversion of natural gas around the metering element except for the sole purpose of inspecting and servicing equipment.

VIII. For maintenance activities involving production equipment and compression, venting be limited to the depressurization of the subject equipment to ensure safe working conditions. For maintenance of production equipment, the associated producing wells will be shut-in to eliminate venting. For maintenance of VRUs, all natural gas normally routed to the VRU will be routed to flare.