District IV

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District Office

District II
811 S. First St., Artesia. NM 88210

State of New Mexico

ARTESIA DISTRICT, Minerals and Natural Resources Department

811 S. First St., Artesia, NM 88210

1000 Rio Brazos Road, Aztec, NM 87410 MAR 2 0 2017

Oil Conservation Division 1220 South St. Francis Dr.

1220 S. St. Francis Dr., Santa Fe, NM 87505 <u>DECEIVED</u>

Santa Fe, NM 87505

GAS CAPTURE PLAN

Date: 02/24/2017	
□ Original □	Operator & OGRID No.: ROCKCLIFF OPERATING NEW MEXICO, LLC; 371115
☐ 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	Footages	Expected	Flared or	Comments
l			(ULSTR)		MCF/D	Vented	
	EL TORO GIGANTE 23	30-015-	UL – M; S-14; T-	340'FSL,	2,760'	N/A	GAS TO BE SOLD
V	431H	44089	23S; R-28E	780'FWL			IMMEDIATELY
	EL TORO GIGANTE 23	30-015-	UL - M; S-14; T-	340'FSL,	1,360	N/A	GAS TO BE SOLD
İ	211H	44090	23S; R-28E	350'FWL			IMMEDIATELY
	EL TORO INVICTA 14	30-015-	UL - M; S-14; T-	340'FSL,	3,050	N/A	GAS TO BE SOLD
	221H	44091	23S; R-28E	330'FWL			IMMEDIATELY
	EL TORO INVICTA 14	30-015-	UL - M; S-14; T-	340'FSL,	1,180	N/A	GAS TO BE SOLD
	301H	44088	23S; R-28E	800'FWL			IMMEDIATELY

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 DCP Operating Company, LP ("DCP") and will be connected to DCP's low/high pressure gathering system located in Eddy County, New Mexico. It will require approximately 10,000' of pipeline to connect the facility to low/high pressure gathering system. Rockcliff Operating New Mexico, LLC provides (periodically) to DCP a drilling, completion and estimated first production date for wells that are scheduled to be drilled in the foreseeable future. In addition, Rockcliff Operating New Mexico, LLC and DCP have periodic conference calls to discuss changes to drilling and completion schedules. Gas from these wells will be processed at DCP's Processing Plant located in Sec. 19, Twn. 19S, Rng. 32E, Lea County, New Mexico. 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 DCP system at that time. Based on current information, it is **Rockcliff Operating New Mexico**, LLC'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
 - o Only a portion of gas is consumed operating the generator, remainder of gas will be flared
- Compressed Natural Gas On lease
 - o Gas flared would be minimal, but might be uneconomical to operate when gas volume declines
- NGL Removal On lease
 - o Plants are expensive, residue gas is still flared, and uneconomical to operate when gas volume declines