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

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

Submit Original
to Appropriate
District Office

ARTESIA DISTRICT

GAS CAPTURE PLAN

NOV 2 8 2017

Date: 11/28/17

☒ Original
☐ Amended - Reason for Amendment:

Operator & OGRID No.: _____ COG Operating LLC - 229137 RECEIVED

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 MCF/D	Flared or Vented	Comments
SRO State Com #41H	30-015-41739	3-26S-28E	190'N 2310'E	N/A	Sold	GC 11/10/17

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 ETC Field Services LLC and will be connected to Red Bluff low/high pressure gathering system located in _Culberson_ County, Texas. It will require _no_ pipeline to connect the facility to low/high pressure gathering system. COG Operating LLC provides (periodically) to_ETC Field Services LLC,_ a drilling, completion and estimated first production date for wells that are scheduled to be drilled in the foreseeable future. In addition, COG Operating LLC and ETC Field Services LLC have periodic conference calls to discuss changes to drilling and completion schedules. Gas from these wells will be processed at _Red Bluff_ Processing Plant located in Sec. _35_ , Blk _57_ Twn. _2_ , _Culberson_ County, 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 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 Gas Transporter system at that time. Based on current information, it is Operator'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