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District 1	State of New Mexico
1625 N. French Dr., Hobbs, NM 88240	State of frew mexico
District II	Energy, Minerals and Natural Resources Department
811 S. First St., Artesia, NM 88210	Energy Minerals and Natural Resources Department DEC 0 4 2019
District III	Oil Conservation Division
1000 Rio Brazos Road, Aztec, NM 87410	On Conservation Division
District IV	ICTIANTESIAO, C.D.20 South St. Francis Dr. Santa Fe. NM 87505
1220 S. St. Francis Dr., Santa Fe, NM 97595	Santa Fe NIM 87505

Submit Original to Appropriate District Office

GAS CAPTURE PLAN

Santa Fe, NM 87505

Date: 6/26/2019

 \boxtimes Original

Devon & OGRID No.: Devon Energy Prod Co., LP (6137)

□ Amended - Reason for Amendment:

This Gas Capture Plan outlines actions to be taken by the Devon 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
THOROUGHBRED 10- 3 FED 332H	N/A	LOT N, SEC 10 T26S, R31E	220 FSL 1500 FWL			THOROUGHBRED 10 CTB 3
THOROUGHBRED 10- 3 FED 712H	N/A	LOT N, SEC 10 T26S, R31E	220 FSL 1470 FWL			THOROUGHBRED 10 CTB 3
THOROUGHBRED 10- 3 FED 732H	N/A	LOT N, SEC 10 T26S, R31E	220 FSL 1530 FWL			THOROUGHBRED 10 CTB 3
THOROUGHBRED 10- 3 FED COM 731H	N/A	LOT M, SEC 10 T26S, R31E	220 FSL 410 FWL			THOROUGHBRED 10 CTB 3
THOROUGHBRED 10- 3 FED COM 621H	N/A	LOT M, SEC 10 T26S, R31E	220 FSL 380 FWL			THOROUGHBRED 10 CTB 3
THOROUGHBRED 10- 3 FED COM 711H	N/A	LOT M, SEC 10 T26S, R31E	220 FSL 350 FWL			THOROUGHBRED 10 CTB 3

Gathering System and Pipeline Notification

Well(s) will be connected to a production facility after flowback operations are complete, if DCP system is in place. The gas produced from production facility is dedicated to DCP and will be connected to DCP low/high pressure gathering system located in Lea County, New Mexico. It will require 0' of pipeline to connect the facility to low/high pressure gathering system. Devon 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, Devon and DCP have periodic conference calls to discuss changes to drilling and completion schedules. Gas from these wells will be processed at DCP Processing Plant located in Sec.19, Twn. 195, Rng. 32E, Eddy 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 Devon'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 nonpipeline 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.