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 DEC 0 9 2019 Submit Original to Appropriate District Office

Oil Conservation Division 1220 South St. Francis Dr. DISTRICTI-ARIESIAO.C.D. Santa Fe, NM 87505

GAS CAPTURE PLAN

Date: 7/12/2019

Original Operator & OGRID No.: Novo Oil & Gas Northern Delaware, LLC (372920)

Amended - Reason for Amendment: added more wells to pad

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: A C-129 must be submitted and approved prior to exceeding 60 days allowed by Rule 19.15.18.12. A

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)	API.	SHL (ULSTR)	SHL Footages	Expected MCF/D	Flared or, Vented	Comments
Goonch Fed Com 04 131H	30-015=	M-4-23S-29E	1140 FSL & 980 FWL	200.	30 days	Time depends on well clean up
Goonch Fed Com 04 132H	30-015 ₆ ;	M-4-23S-29E	H40FSU&TI80FWL	200	30 days	Time depends on well clean up
Goonch Fed Com 04 211H	30-015	M-4-23S-29E	1120 FSL & 980 FWL	4000,	(30 days	Time depends on well clean up
Goonch Fed Com 04 212H	×30-015-	M-4-23S-29E)	1/120 FSE & 1180 FWL	4000	30 dayş	Time depends on well clean up
Goonch Fed Coin 04 221H	30-013-	M-4-23S-29E	1100 FSL & 980 FWL	4000	:30,days	Time depends on well clean up
Goonch Fed Com 04 222H	30-015	/N-4-23S-29E	1100 FSL & 1180 FWL	4000	30 days	Time depends on well clean up
Goonch Fed Com 04 23 LH	30-015-	M-4-23S-29E	1080 FSL & 980 FWL	4000	:30 days	Time depends on well clean up
Goonch Fed Com 04 232H	×30-0 F5-	/M-4-23S-29E	1080:F\$L& 1180 FWL:	4000	30 days	Time depends on well clean up

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 not yet dedicated. However, negotiations are underway. One possible connection is an existing Enterprise line that is 200 yards west. Novo Oil & Gas Northern Delaware, LLC will provide (periodically) to its Gas Transporter a drilling, completion and estimated first production date for wells that are scheduled to be drilled in the foreseeable future. In addition, Novo Oil & Gas Northern Delaware, LLC and its Gas Transporter have periodic conference calls to discuss changes to drilling and completion schedules. Gas from these wells will be processed at an as yet undetermined Gas Transporter Processing Plant located in 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 its Gas Transporter system at that time. Based on current information, it is Novo Oil & Gas Northern Delaware, LLC's belief an existing or new 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
 - 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