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State of New Mexico Energy, Minerals and Natural Resources Department 3 1 2020

Submit Original to Appropriate

Oil Conservation Division MNRD-OCD ARTESIA Santa Fe, NM 87505

GAS CAPTURE PLAN

327119 30.015-44679

Date:	01/26/2018
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□ Original

Operator & OGRID No.: Kaiser-Francis Oil Company, 12361

☐ 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
		(ULSTR)		MCF/D	Vented	
Mosaic Fed 2419 WC 1H		24-23S-28E		2000	0	
Mosaic Fed 2419 WC 2H		24-23S-28E		2000	0	
Mosaic Fed 2419 WA 1H		24-23S-28E		 2000	0	
Mosaic Fed 2419 WA 1H		24-23S-28E		2000	0	
Mosaic Fed 2419 WAM		24-23S-28E		2000	0	
Mosaic Fed 2419 BS 1H		24-23S-28E		2000	0	
Mosaic Fed 2419 BS 1H		24-23S-28E		2000	0	

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 Sendero and will be connected to Sendero low/high pressure gathering system located in _Eddy_ County, New Mexico. It will require 11,000' of pipeline to connect the facility to low/high pressure gathering system. Kaiser-Francis Oil Company provides (periodically) to Sendero a drilling, completion and estimated first production date for wells that are scheduled to be drilled in the foreseeable future. In addition, Kaiser-Francis Oil Company and Sendero have periodic conference calls to discuss changes to drilling and completion schedules.

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 Targa system at that time. Based on current information, it is Kaiser-Francis Oil Company'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 φperate 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