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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

Submit Original to Appropriate District Office

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

Date: <u>8-19-18</u>

X Original

GAS CAPTURE PLAN

Operator & OGRID No.: Tap Rock Operating, LLC (372043)

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

Well Name	API	SHL (ULSTR)	SHL Footages	Expected MCF/D	Flare or Vent	Comments
Old Chub Fed Com 131H	30-015-	A-8-23s-27e	742' FNL & 396' FEL	1750	<30 days	flare until well clean, then connect
Old Chub Fed Com 201H	30-015-	A-8-23s-27e	717' FNL & 396' FEL	3500	<30 days	flare until well clean, then connect

The well(s) that will be located at the production facility are shown in the table below.

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 the production facility is not yet dedicated, but will be connected to a 3rd party gathering system located in <u>Eddy</u> County, New Mexico. It will require an <u>unknown</u> length of pipeline to connect the facility to a gathering system. <u>Operator</u> will provide (periodically) to <u>Gas Transporter</u> a drilling, completion and estimated first production date for wells that are scheduled to be drilled in the foreseeable future. In addition, <u>Operator</u> and <u>Gas Transporter</u> will have periodic conference calls to discuss changes to drilling and completion schedules. Gas from these wells will be processed at an <u>unknown</u> Processing Plant located in <u>Eddy</u> County, New Mexico. The actual flow of the gas will be based on compression operating parameters and gathering system pressures. Lucid and Enterprise have gathering lines in Section 8.

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 <u>Gas Transporter</u> system at that time. Based on current information, it is <u>Operator's</u> 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
 - o Plants are expensive, residue gas is still flared, and uneconomical to operate when gas volume declines

PECOS DISTRICT DRILLING CONDITIONS OF APPROVAL

OPERATOR'S NAME:	Tap Rock Operating LLC
LEASE NO.:	NMNM091071
WELL NAME & NO.:	Old Chub Fed Com 131H
SURFACE HOLE FOOTAGE:	1785'/N & 360'/E
BOTTOM HOLE FOOTAGE	1668'/N & 200'/W
LOCATION:	Section 8, T.23 S., R.27 E., NMPM
COUNTY:	Eddy County, New Mexico



H2S	O Yes	© No	
Potash	• None	• Secretary	O R-111-P
Cave/Karst Potential	O Low	• Medium	C High
Cave/Karst Potential	Critical		
Variance	O None	• Flex Hose	C Other
Wellhead	C Conventional	C Multibowl	🖸 Both
Other	4 String Area	Capitan Reef	□ WIPP
Other	Fluid Filled	Cement \$queeze	🗖 Pilot Hole
Special Requirements	🗖 Water Disposal	COM	🗖 Unit

A. HYDROGEN SULFIDE

Hydrogen Sulfide (H2S) monitors shall be installed prior to drilling out the surface shoe. If H2S is detected in concentrations greater than 100 ppm, the Hydrogen Sulfide area shall meet Onshore Order 6 requirements, which includes equipment and personnel/public protection items. If Hydrogen Sulfide is encountered, provide measured values and formations to the BLM.

B. CASING

- 1. The 13-3/8 inch surface casing shall be set at approximately 375 feet (a minimum of 70 feet (Eddy County) into the Rustler Anhydrite and above the salt) and cemented to the surface.
 - a. If cement does not circulate to the surface, the appropriate BLM office shall be notified and a temperature survey utilizing an electronic type temperature survey with surface log readout will be used or a cement bond log shall be run to verify the top of the cement. Temperature survey will be run a minimum of six hours after pumping cement and ideally between 8-10 hours after completing the cement job.
 - b. Wait on cement (WOC) time for a primary cement job will be a minimum of $\underline{8}$

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Approval Date: 01/29/2020