District I 1625 N. French Dr., Hobbs, NM 88240 District II 811 S. First St., Artesia, NM 88210 1000 Rio Brazos Road, Aztec, NM 87410 1220 S. St. Francis Dr., Santa Fe, NM 87505

Date: 01/10/2020

State of New Mexico Energy, Minerals and Natural Resources Department

Oil Conservation Division

Submit Original to Appropriate District Office

1220 South St. Francis Dr. Santa Fe, NM 87505

10|07|2020

GAS CAPTURE PLAN

□ Original □ Amended - Reason for Amendment:	Operator & OGRID No.: Kaiser-Francis Oil Company, 12361
This Gas Capture Plan outlines actions to be new completion (new drill, recomplete to new	taken by the Operator to reduce well/production facility flaring/venting for vone, 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
Bell Lake Unit North 117H		5-23S-34E		2000	0	
Bell Lake Unit North 217H		5-23S-34E		2000	0	
Bell Lake Unit North 317H	20.025	5-23S-34E		2000	0	
Bell Lake Unit North 417H		5-23S-34E		2000	0	
Bell Lake Unit North 118H	47850	5-23S-34E		2000	0	
Bell Lake Unit North 218H		5-23S-34E		2000	0	
Bell Lake Unit North 318H		5-23S-34E		2000	0	
Bell Lake Unit North 418H		5-23S-34E		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 Targa and will be connected to Targa low/high pressure gathering system located in Lea_ 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 Targa 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 Targa have periodic conference calls to discuss changes to drilling and completion schedules. Gas from these wells will be processed at Targa Processing Plant located in Sec. 36, Twn. 19S, Rng. 36E, Lea 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 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
 - o 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
 - Plants are expensive, residue gas is still flared, and uneconomical to operate when gas volume declines