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

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

Submit Original to Appropriate District Office

HOBBS OCD
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GAS CAPTURE PLAN

Date: 05/21/2019

☒ Original
☐ Amended - Reason for Amendment:

Operator & OGRID No.: 372043

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 (ULSTR)	Footages	Expected MCF/D	Flared or Vented	Comments
THE CONTEST FED COM 201H		L SEC 9 T24S R34E	1426' FSL 1272' FWL	+/- 2000	21 days	Gas will be flared for ~21 days during flowback before being turned to the TB. Time est. depends on sales connect and well cleanup.
THE CONTEST FED COM 202H		K SEC 9 T24S R34E	1425' FSL 1377' FWL	+/- 2000	21 days	Gas will be flared for ~21 days during flowback before being turned to the TB. Time est. depends on sales connect and well cleanup.
THE CONTEST FED COM 211H		L SEC 9 T24S R34E	1401' FSL 1272' FWL	+/- 2000	21 days	Gas will be flared for ~21 days during flowback before being turned to the TB. Time est. depends on sales connect and well cleanup.
THE CONTEST FED COM 212H		K SEC 9 T24S R34E	1400' FSL 1377' FWL	+/- 2000	21 days	Gas will be flared for ~21 days during flowback before being turned to the TB. Time est. depends on sales connect and well cleanup.

THE CONTEST FED COM 215H 30-025-46877		L SEC 9 T24S R34E	1401' FSL 1297' FWL	+/- 2000	21 days	Gas will be flared for ~21 days during flowback before being turned to the TB. Time est. depends on sales connect and well cleanup.

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 should be connected to Salt Creek Midstream and will be connected to Salt Creek Midstream low/high pressure gathering system located in Lea County, New Mexico. It will require approximately 1500' of pipeline to connect the facility to low/high pressure gathering system. Tap Rock Operating, LLC provides (periodically) to Salt Creek Midstream a drilling, completion and estimated first production date for wells that are scheduled to be drilled in the foreseeable future. In addition, Tap Rock Operating, LLC and Salt Creek Midstream have periodic conference calls to discuss changes to drilling and completion schedules. Gas from these wells will be Processed at Salt Creek Midstream's Red Hills processing facility located in Lea County, New Mexico, and, although unanticipated, any issues with downstream facilities could cause flaring at the wellhead. 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 Salt Creek Midstream's system at that time. Tap Rock Operating, LLC'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 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