



## GAS CAPTURE PLAN CLARIFICATIONS FORM 4 GAS CAPTURE TAB

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During the Operator Meeting on March 8, 2022, we received a few questions regarding COGCC's expectations for gas management for which we had not prepared concise answers. The following information is intended to address several of the questions asked.

COGCC expectations regarding gas management are as follows:

1. All gas production must be reported on the Form 7 Monthly Report of Operations.
2. Gas may not be vented or flared except as specifically allowed by rule or a variance granted by the Commission.
3. Produced gas must be processed through adequately sized separators. Combustion of tank vapor (i.e. flash gas emissions), after adequate separation, is regulated by CPDHE-APCD. Routing saleable gas to a tank without adequate separation upstream of the tank is not allowed.
4. Wells that were in operation prior to January 15, 2021 that were connected to a Gathering Line or beneficially using ALL produced gas on site on January 15, 2021 do not need to submit a Gas Capture Plan unless it:
  - a. stops sending gas to the Gathering Line; or,
  - b. stops or changes the way gas is being beneficially used on site.
  - c. If either or these changes occur, the well must be shut in until the operator receives an approved Gas Capture Plan.
5. Operations not connected to a Gathering Line or beneficially using ALL produced gas on site as of January 15, 2021 must manage produced gas in accordance with an approved Gas Capture Plan.
  - a. Operations permitted on or after January 15, 2021 will include a Gas Capture Plan as part of the Form 2A.
  - b. Operations permitted prior to January 15, 2021 that need to submit or any operation that needs to revise a Gas Capture Plan must use the Form 4.
  - c. The deadline for compliance with submitting a Gas Capture Plan for locations permitted before January 15, 2021 was January 15, 2022 or within 30 days of losing access to a Gathering Line.
  - d. Compliance will be evaluated through routine inspections.
  - e. Operators venting or flaring gas outside the exceptions provided by rule and without an approved variance will be issued a Corrective Action to shut in the well until such time as they are connected to a Gathering Line (Form 10), have an approved Gas Capture Plan (Form 4) that shows they can operate without venting/flaring, or they obtain a variance to vent/flare from the Commission.