



Mull Drilling Company, Inc.  
1700 N. Waterfront Parkway, Bld. 1200  
Wichita, Kansas 67206  
Tel: +1 316.264.6366  
Fax: +1 316.264.6440  
www.mulldrilg.com

January 8, 2022

Colorado Oil & Gas Conservation Commission  
Permitting Division  
1120 Lincoln Street, Suite 801  
Denver, Colorado

**RE:**

***Form 4 Sundry Submittal  
Braukmann Farms #3 Gas Capture Plan  
API# 05-073-06102 – COGCC ID# 218117  
COGCC Doc #402921001***

To whom it may concern:

In this ***Form 4 Sundry*** Submittal you will find the Gas Capture Plan from Mull Drilling Company., Inc. (Mull) for the Braukmann Farms #3 Crude Oil Tank Battery and associated equipment (API# 05-073-06102 – COGCC ID# 218117). Mull is also including all required paperwork and recent Colorado Department of Health & Environment APEN Submittals.

Should there be any questions or concerns feel free to contact us,

A handwritten signature in blue ink that reads "James Beilman".

James Beilman, PG, CPG  
Environmental / Safety Manager  
Tel: +1 316.264.6366 (128)  
Cell: +1 316.807.8880  
JBeilman@Mulldrilling.com



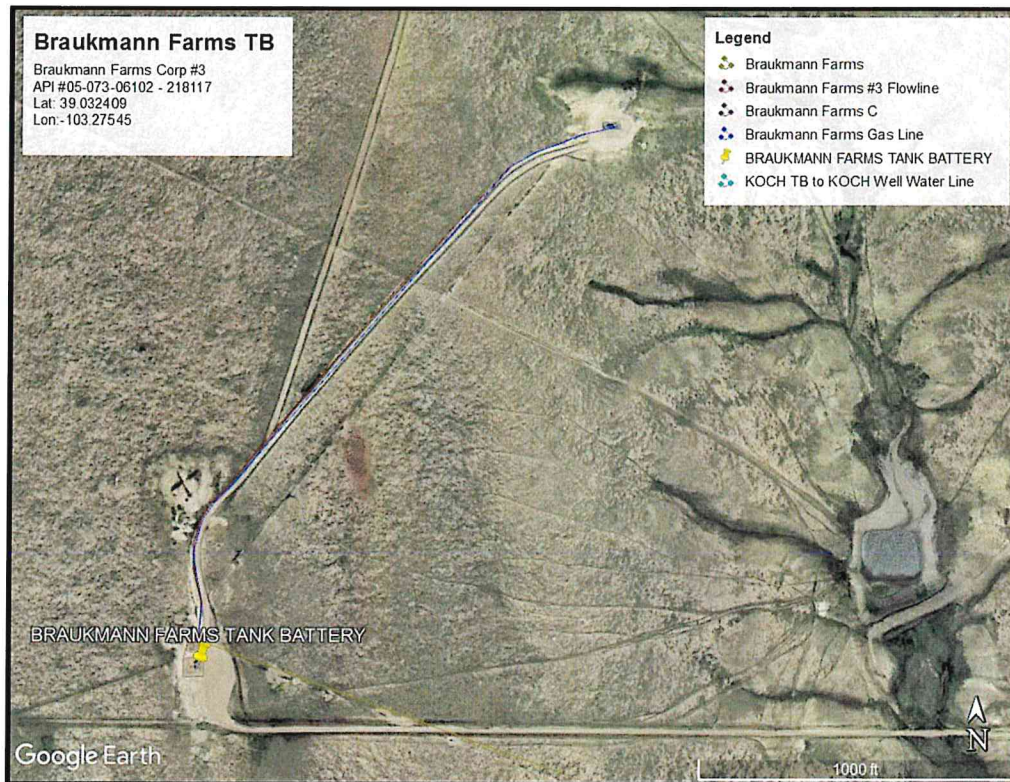


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**Braukmann Farms Crude Oil Tank Battery**  
**05-073-06102 - 218117**  
**CDPHE Permit Number 09LI1365 AIRS ID 073-0077-001**  
**SEWS1, T12S, R53W**  
**Lincoln County, Colorado**

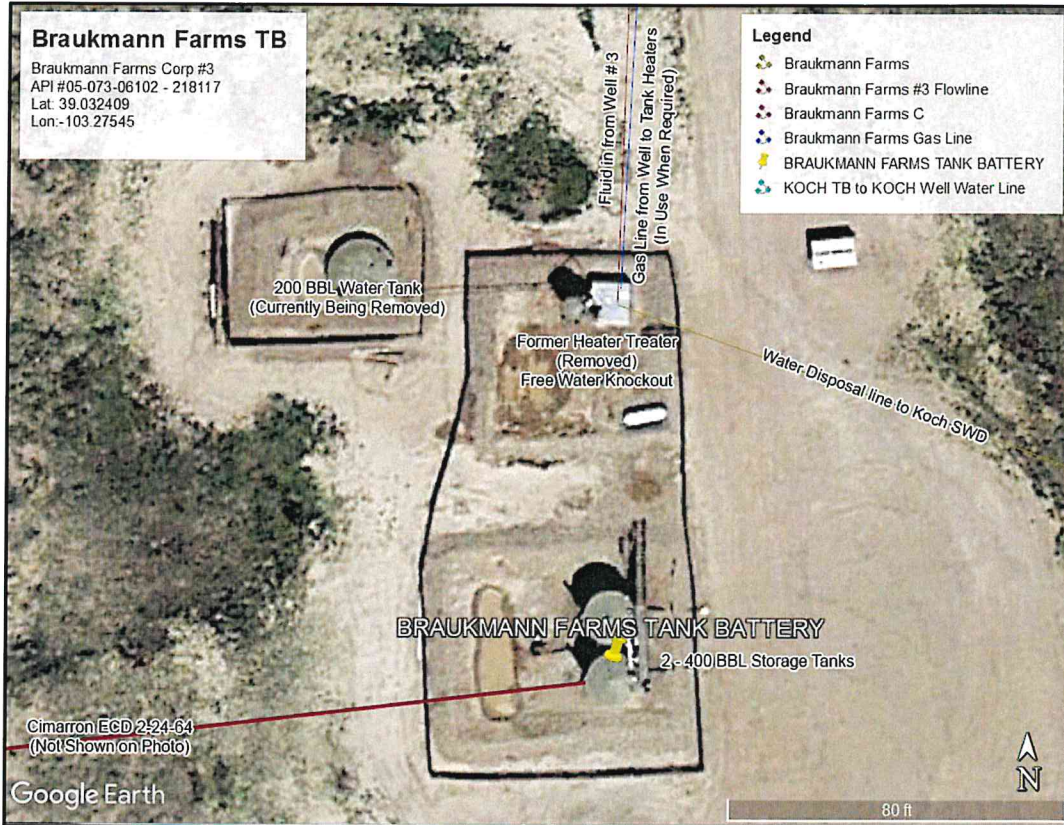
***GAS CAPTURE PLAN***

***Site Map***



Mull Drilling Company., Inc. (Mull) has drafted this plan to comply with Rules 903.d and 903.e.(1).B. The Braukmann Farms Tank Battery and Braukmann Farms Corp #3 well were constructed in 1982. They consist of the consolidated production facilities for 1 - operated well; the location contains a, 2 (400 bbl – Total 800 bbl total) oil storage tanks, 1 200 bbl produced water tanks (slated for removal), 1 produced water knock out, and 1 Cimarron ECD 2-24-64 ECD. Produced water is disposed to the Koch SWD. The Well is electrified with an electric Motor. This is not a request to Vent or Flare.

**Flow Diagram**



<p><b>903.d:</b> Emissions During Production</p>	<p>Gas at this facility has dropped off significantly during its production. Currently, any available gas is piped to the tanks and burned for beneficial reuse if available, which is not the case at this time. Otherwise the gas is currently routed to the ECD for final combustion.</p>
<p><b>903.e.(1).B.i:</b> Description of the Closest Gas Gathering System</p>	<p>No Gas available to sell after beneficial reuse/use on lease.</p>
<p><b>903. e.(1).B.ii:</b> Company operating the</p>	<p>NA</p>

closest Gas Gathering System	
<b>903. e.(1).B.iv:</b> Production Test Plans	The Original Production Test and analytical are supplied below.
<b>903. e.(1).B.v:</b> Safety Risks	Mull does not currently anticipate any safety risks that will require us to allow gas to escape rather than being captured or combusted during normal operating procedures.
<b>903. e.(1).B.vi:</b> Operational BMPs	<p>Mull intends to use the following list of operational best practices to minimize Venting during active and planned maintenance allowed pursuant to Rule 903.d.(1).B:</p> <p>During maintenance activities, Mull will have appropriate gas control equipment on location to minimize all Venting.</p> <p>All facilities maintain a rigorous LDAR Program. In this case, The Meteor Unit TB is checked semi-annually for leaks and verified (when necessary) with a PID/FID approved by the CDPHE and the COGCC.</p> <p>All tanks have sight glasses for visual inspection of fluids during daily gauging events.</p> <p>All Wells have pressure/trip Murphy switches that will shutdown the well in the event of a leak.</p> <p>Flowback controls have been installed for all liquids unloading events.</p>
<b>903. e.(1).B.vii:</b> Procedures to reduce well liquids unloading events	Mull anticipates Well Liquid Unloading events as required for sales. Flowback controls have been installed at this location to send emitted gases to the tanks and then the combustor.
<b>903. e.(1).B.viii:</b> Anticipated volumes of liquids and gas production	Current Well production displays negligible gas production. As displayed by Mulls latest APEN, Liquids production is anticipated to not exceed 4300 bbl per year. The 12 month rolling total from October 2021 is 3872 bbl (flash gas of approximately 4.49 tpy) As stated, flowback controls are installed on this tank battery.