



Mull Drilling Company, Inc.
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January 9, 2022

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

RE:

***Form 4 Sundry Submittal
MUSF #3 Tank Battery Gas Capture Plan
API #05-017-06272, API #05-017-06269, API #05-017-06284
COGCC Facility Id: Not Available
Cogcc Doc# 402921120***

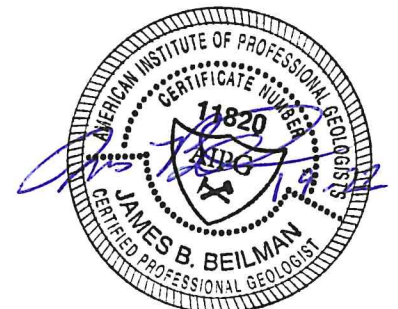
To whom it may concern:

In this ***Form 4 Sundry*** Submittal you will find the Gas Capture Plan from Mull Drilling Company, Inc. (Mull) for the MUSF #3 Crude Oil Tank Battery and associated equipment (API *Various as displayed above*). 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 black ink that reads "James Beilman". The signature is written in a cursive, flowing style.

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MUSF # 3 Crude Oil Tank Battery

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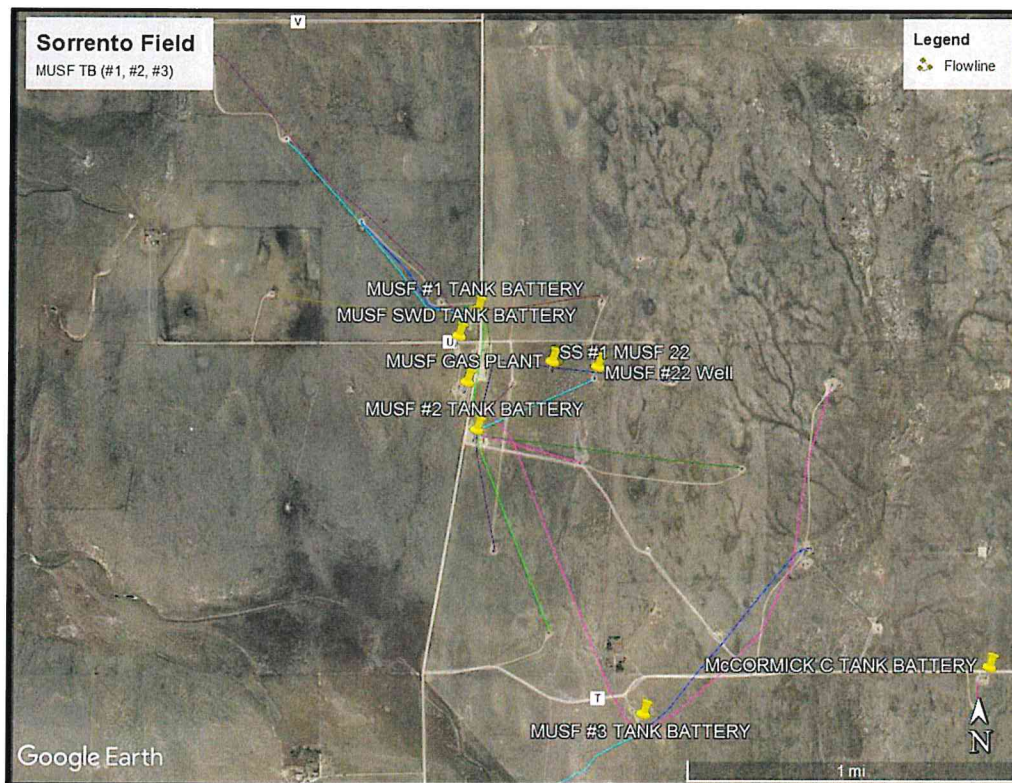
CDPHE Permit Number 09CY1449 AIRS ID 017-0251-001

Sec 9, T14S, R49W

Cheyenne County, Colorado

GAS CAPTURE PLAN

Site Map



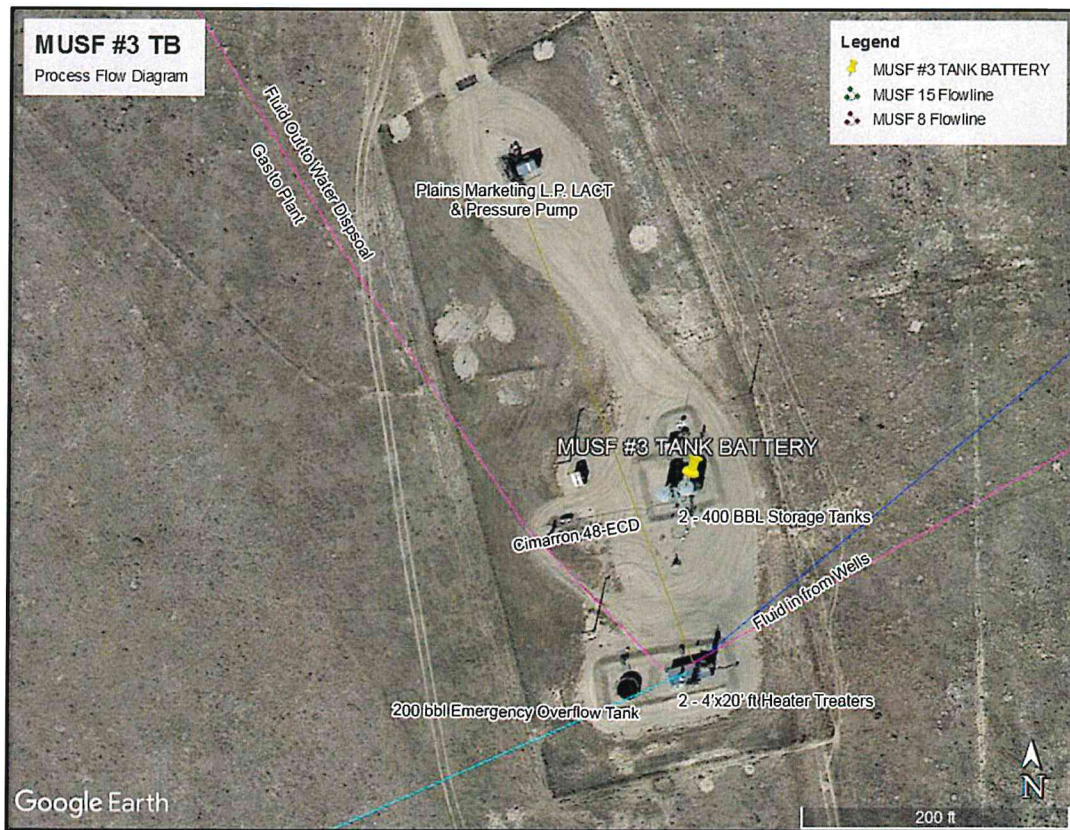
Mull Drilling Company., Inc. (Mull) has drafted this plan to comply with Rules 903.d and 903.e.(1).B. The MUSF #3 Tank Battery and associated wells were constructed in 1983. They consist of the consolidated production facilities for 3 operated wells: the location contains 2 oil storage tanks (400 bbl – Total 800 bbl total), 1 200 bbl emergency overflow tank, 2 - 4'x20' ft Heater Treaters, and 1 Cimarron 48-ECD. Produced water is disposed to the local Sorrento Plant SWD. The wells are powered via electrical motors and electricity.

Gas at this tank battery is separated and sent to the Sorrento Compressor Station for Re-injection into the reservoir. The Gas is of poor quality due to significant (and increasing) nitrogen concentrations. The station operates under CDPHE permit numbers 85CY204-1 for Engine source emissions and 95CY049 for VOC Fugitive emissions.

Liquids are loaded directly into Plain Marketing Lease Automatic Custody Transfer (LACT) and pressured up as required for transport through a high pressure line.

This is not a request to Vent or Flare.

Flow Diagram



903.d: Emissions During Production	Gas at this facility is continuing to drop in quality as the local nitrogen plant continues to inject nitrogen into the reservoir. Currently, any
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	<p>available gas is piped from heater treaters, burned for beneficial reuse in the treaters themselves or sent to the compressor station for reinjection, which is not the case at this time. Otherwise all otherwise available gas (Flash) is currently routed to the ECD for final combustion.</p>
<p>903.e.(1).B.i: Description of the Closest Gas Gathering System</p>	<p>All available gas not used for beneficial reuse is sent to the compressor station for reinjection into the reservoir.</p>
<p>903. e.(1).B.ii: Company operating the closest Gas Gathering System</p>	<p>NA</p>
<p>903. e.(1).B.iv: Production Test Plans</p>	<p>The Original Production Test and analyticals are supplied (As available). This includes original gas analysis and liquids analysis/modeling updated for rolling 12 emissions calculations through 2021. A copy of the Latest APEN Update is also being supplied.</p>
<p>903. e.(1).B.v: Safety Risks</p>	<p>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.</p>
<p>903. e.(1).B.vi: Operational BMPs</p>	<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>Flow for liquids is all into the LACT and to Plains Marketing L.P. for final sale. Should Liquid Loading/Unloading occur, flowback controls have been installed to prevent any venting or release of emissions.</p> <p>All facilities maintain a rigorous LDAR Program. In this case MUSF #3 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 in this system maintain a real-time monitoring system to determine fluid totals.</p> <p>All tanks have sight glasses for visual inspection of fluids during daily gauging events. All Wells have pressure/trip Murphy switches that will shutdown the well in the event of a leak.</p>

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903. e.(1).B.vii: Procedures to reduce well liquids unloading events	Mull anticipates Well Liquid Unloading events as required for operation. Flowback controls have been installed at this location to send emitted gases to the tanks and then the combustor.
903. e.(1).B.viii: Anticipated volumes of liquids and gas production	As displayed by Mulls latest APEN, liquids production is anticipated to not exceed approximately 30000 bbl per year. The 12 month rolling total from October 2021 produces approximately 3.41 tpy Flash VOC's. As stated, flow back controls are installed on this tank battery.