Atchafalaya Measurement Inc 416 East Main Street, Artesia NM 88210 575-746-3481

Sample Information

	Sample Information
Sample Name	OXY_Burton Flats CTB ProductionGC2-73019-12
Station Number	14071P
Lease Name	Burton Flats CTB Production
Analysis For	OXY USA
Producer	OXY USA
Field Name	Burton Flats
County/State	N/A
Frequency/Spot Sample	Spot
Sampling Method	Fill Empty
Sample Deg F	97
Atmos Deg F	79
Flow Rate	153.142
Line PSIG	48
Date Sampled/Time Sampled	7-23-19
Cylinder Number	N/A
Cylinder Clean Date	N/A
Sampled By	Derek Sauder
Analysis By	Pat Silvas
Verified/Calibrated Date	7-29-19
Report Date	2019-07-30 10:46:10

Component Results

Component Name	Ret. Time	Peak Area	Norm%	GPM (Dry) (Gal. / 1000 cu.ft.)
Nitrogen	23.100	30269.9	2.1819	0.000
H2S	0.000	0.0	0.0000	0.000
Methane	23.860	787502.9	75.1296	0.000
Carbon Dioxide	27.900	5825.9	0.3597	0.000
Ethane	36.960	202456.6	11.6915	3.121
Propane	77.160	133263.6	5.8157	1.600
i-Butane	29.820	64807.6	0.7713	0.252
n-Butane	32.080	165504.2	1.9549	0.615
i-Pentane	39.120	49926.9	0.5126	0.187
n-Pentane	41.900	54913.2	0.5487	0.199
C6's	50.750	43911.0	0.3860	0.158
C7's	67.000	54984.0	0.4654	0.214
C8's	84.000	18044.0	0.1628	0.083
C9's	102.000	4888.0	0.0159	0.009
C10 Plus	146.000	1090.0	0.0040	0.002
Total:			100.0000	6.441

Results Summary

Result	Dry	Sat. (Base)
Total Raw Mole% (Dry)	103.9585	
Pressure Base (psia)	14.650	
Temperature Base	60.00	
Gross Heating Value (BTU / Ideal cu.ft.)	1294.9	1272.2
Gross Heating Value (BTU / Real cu.ft.)	1300.1	1277.9
Relative Density (G), Ideal	0.7687	0.7661
Relative Density (G), Real	0.7715	0.7692
Compressibility (Z) Factor	0.9960	0.9956

EVENT SPECIFIC JUSTIFICATIONS FORM

Facility: Burton Flats CTB

Cause: Sudden and unexpected compressor malfunction

Duration of event: 7 hours

Method of Flared Gas Measurement: Flare Meter

1. Reason why this event was beyond Operator's control:

The emissions event was caused by the unforeseen, unexpected, sudden, and unavoidable breakdown of equipment or process that was beyond the owner/operator's control, and did not stem from activity that could have been foreseen and avoided, and could not have been avoided by good design, operation, and preventative maintenance practices. It is OXY's policy to route all stranded sales gas to a flare during an unforeseen and unavoidable emergency or malfunction, in order to minimize emissions as much as possible. The flare is regularly monitored to the ensure flame is lit and meeting opacity requirements. This event was a sudden and unforeseeable compressor malfunction of USA sales gas compressor #1 due to a faulty pressure relief valve on the second interstage discharge, which caused the compressor to vent gas suddenly and unexpectedly. The interstage pressure on the compressor unit was high enough that it was forcing the pressure relief valve to open and vent. Immediate attempts by Oxy production techs to correct the issue and stop the venting were unsuccessful and therefore, the compressor unit had to be shut down, triggering a flaring event. In order to correct the malfunctioning of sales gas compressor unit #1, OXY contacted the compressor owner, USA Compression, and requested a mechanic be sent to repair gas sales compressor unit #1 as soon as possible. Compressor mechanic, upon arrival, which took some time to arrive to the facility, inspected the unit and to determine the cause of to find out what was needed to repair the dump valve. Compressor mechanic determined the cause of the malfunction and did not have the necessary replacement parts with him, so he restarted sales gas compressor unit # 1, until he could get the necessary equipment parts and do the replacement. Compressor mechanic picked up the necessary equipment parts and came back out on site as soon possible to repair the bad stem inside the dump valve. Shortly thereafter, sales gas compressor unit #1 was returned to normal working service. OXY personnel were in place and available at the facility location when equipment was returned to working service. Notwithstanding proper gas compressor design and operation, various forms of mechanical or technical issues can be sudden, reasonably unforeseeable and unexpected which can cause compressor unit malfunctions to occur without warning or advance notice. This incident was completely out of OXY's control to prevent from happening. OXY made every effort to control and minimize emissions as much as possible during this event.

2. Steps Taken to limit duration and magnitude of venting or flaring:

The emissions event was caused by the unforeseen, unexpected, sudden, and unavoidable breakdown of equipment or process that was beyond the owner/operator's control, and did not stem from activity that could have been foreseen and avoided, and could not have been avoided by good design, operation, and preventative maintenance practices. It is OXY's policy to route all stranded sales gas to a flare during an unforeseen and unavoidable emergency or malfunction, in order to minimize emissions as much as possible. The flare is regularly monitored to the ensure flame is lit and meeting opacity requirements. In this case, the steps taken to limit duration and magnitude of flaring was for Oxy production techs to quickly respond to the compression equipment alarm on USA sales gas compressor #1 and take the immediate steps to attempt to correct the issue in an effort stop the slight venting coming off the pressure relief valve on USA sales gas compressor #1. Oxy production techs efforts to perform immediate troubleshooting actions were unsuccessful and therefore, the malfunctioning compressor unit had to be shut down, triggering a flaring event. In addition to shutting USA sales gas compressor unit # 1, OXY routed all the stranded sales gas to a flare with a 98% combustion efficiency in order to lessen emissions as much as possible while also shutting in five (5) wells in effort to reduce the volume of flaring to minimize emissions. The flare is regularly monitored to ensure the flame is lit and meeting opacity requirements. In order to correct the malfunctioning of USA sales gas compressor unit #1, OXY contacted the compressor owner, USA Compression, and requested a mechanic be sent to repair gas sales compressor unit #1 as soon as possible. Compressor mechanic, upon arrival, which took some time to arrive to the facility due to the company is short-staffed, inspected the unit and to determined the malfunctioning cause to be a faulty pressure relief valve. Notwithstanding proper gas compressor design and operation, various forms of mechanical or technical issues can be sudden, reasonably unforeseeable and unexpected which can cause compressor unit malfunctions to occur without warning or advance notice. This incident was completely out of OXY's control to prevent from happening. OXY made every effort to control and minimize emissions as much as possible during this event.

3. Corrective Actions taken to eliminate the cause and reoccurrence of venting or flaring:

The emissions event was caused by the unforeseen, unexpected, sudden, and unavoidable breakdown of equipment or process that was beyond the owner/operator's control, and did not stem from activity that could have been foreseen and avoided, and could not have been avoided by good design, operation, and preventative maintenance practices. It is OXY's policy to route all stranded sales gas to a flare during an unforeseen and unavoidable emergency or malfunction, in order to minimize emissions as much as possible. The flare is regularly monitored to the ensure the flame is lit and meeting opacity requirements. Oxy cannot take any corrective actions to eliminate the cause and potential reoccurrence of compressor malfunctions as notwithstanding proper gas compressor design and operation, various forms of mechanical or technical issues can be sudden, reasonably unforeseeable and unexpected which can cause compressor unit malfunctions to occur without warning or advance notice. Oxy continually strives to maintain and operate its facility equipment in a manner consistent with good practices for minimizing emissions and reducing the number of emission events. USA sales gas compressor unit # 1 was working as designed and operated

normally prior to the sudden and without warning malfunction of the compressor's pressure relief valve. Oxy has a strong and positive compression equipment preventative maintenance program in place. This incident was completely out of OXY's control to prevent from happening as it was determined the malfunction occurred due to a faulty pressure relief valve, yet OXY made every effort to control and minimize emissions as much as possible during this event. The only actions that Oxy can take and handle that is within its control, is to keep continue with its compression equipment preventative maintenance program for this unit.

<u>District I</u> 1625 N. French Dr., Hobbs, NM 88240 Phone:(575) 393-6161 Fax:(575) 393-0720 District II

811 S. First St., Artesia, NM 88210 Phone:(575) 748-1283 Fax:(575) 748-9720 District III

1000 Rio Brazos Rd., Aztec, NM 87410 Phone:(505) 334-6178 Fax:(505) 334-6170

1220 S. St Francis Dr., Santa Fe, NM 87505 Phone:(505) 476-3470 Fax:(505) 476-3462

State of New Mexico Energy, Minerals and Natural Resources Oil Conservation Division 1220 S. St Francis Dr. **Santa Fe, NM 87505**

QUESTIONS

Action 33315

QUESTIONS

Operator:	OGRID:
OXY USA INC	16696
P.O. Box 4294	Action Number:
Houston, TX 772104294	33315
	Action Type:
	[C-129] Venting and/or Flaring (C-129)

QUESTIONS

Determination of Reporting Requirements			
Answer all questions that apply. The Reason(s) statements are calculated based on your answers and may provide addional guidance.			
Was or is this venting or flaring caused by an emergency or malfunction	Yes		
Did or will this venting or flaring last eight hours or more cumulatively within any 24-hour period from a single event	No		
Is this considered a submission for a notification of a major venting or flaring	Yes, minor venting or flaring of natural gas.		
The operator shall file a form C-141 instead of a form C-129 for a release that includes liquid during venting or flaring that is or may be a major or minor release under			
Was there or will there be at least 50 MCF of natural gas vented or flared during this event	Yes		
Did this venting or flaring result in the release of ANY liquids (not fully and/or completely flared) that reached (or has a chance of reaching) the ground, a surface, a watercourse, or otherwise, with reasonable probability, endanger public health, the environment or fresh water	No		

Unregistered Facility Site		
Please provide the facility details, if the venting or flaring occurred or is occuring at a facility that does not have an Facility ID (f#) yet.		
Facility or Site Name Burton Flats CTB		
Facility Type	Tank Battery - (TB)	

Equipment Involved	
Primary Equipment Involved	Other (Specify)
Additional details for Equipment Involved. Please specify	Emergency Flare, sudden and unforeseeable compressor malfunction of USA sales gas compressor #1 due to a faulty pressure relief valve .

Representative Compositional Analysis of Vented or Flared Natural Gas		
Please provide the mole percent for the percentage questions in this group.		
Methane (CH4) percentage	75	
Nitrogen (N2) percentage, if greater than one percent	2	
Hydrogen Sulfide (H2S) PPM, rounded up	0	
Carbon Dioxide (C02) percentage, if greater than one percent	0	
Oxygen (02) percentage, if greater than one percent	0	
If you are venting and/or flaring because of Pipeline Specification, please provide the required specifications for each gas.		
Methane (CH4) percentage quality requirement	Not answered.	
Nitrogen (N2) percentage quality requirement	Not answered.	
Hydrogen Sufide (H2S) PPM quality requirement	Not answered.	
Carbon Dioxide (C02) percentage quality requirement	Not answered.	
Oxygen (02) percentage quality requirement	Not answered.	

Date(s) and Time(s)		
Date venting or flaring was discovered or commenced	05/29/2021	
Time venting or flaring was discovered or commenced	04:00 PM	
Is the venting or flaring event complete	Yes	
Date venting or flaring was terminated	05/29/2021	
Time venting or flaring was terminated	11:00 PM	
Total duration of venting or flaring in hours, if venting or flaring has terminated	7	
Longest duration of cumulative hours within any 24-hour period during this event	7	

Measured or Estimated Volume of Vented or Flared Natural Gas		
Natural Gas Vented (Mcf) Details	Cause: Equipment Failure Other (Specify) Natural Gas Vented Spilled: 98 Mcf Recovered: 0 Mcf Lost: 98 Mcf]	
Natural Gas Flared (Mcf) Details	Not answered.	
Other Released Details	Not answered.	
Additional details for Measured or Estimated Volume(s). Please specify	Not answered.	
Is this a gas only submission (i.e. only Mcf values reported)	Yes, according to supplied volumes this appears to be a "gas only" report.	

Venting or Flaring Resulting from Downstream Activity		
Was or is this venting or flaring a result of downstream activity	No	
Date notified of downstream activity requiring this venting or flaring	Not answered.	
Time notified of downstream activity requiring this venting or flaring	Not answered.	

Steps and Actions to Prevent Waste

	-
For this event, the operator could not have reasonably anticipated the current event and it was beyond the operator's control.	True
Please explain reason for why this event was beyond your operator's control	See Justification Form> This event was a sudden and unforeseeable compressor malfunction of USA sales gas compressor #1 due to a faulty pressure relief valve on the second interstage discharge, which caused the compressor to vent gas suddenly and unexpectedly. The interstage pressure on the compressor unit was high enough that it was forcing the pressure relief valve to open and vent. Immediate attempts by Oxy production techs to correct the issue and stop the venting were unsuccessful and therefore, the compressor unit had to be shut down, triggering a flaring event. In order to correct the malfunctioning of sales gas compressor unit #1, OXY contacted the compressor owner, USA Compression, and requested a mechanic be sent to repair gas sales compressor unit #1 as soon as possible.
Steps taken to limit the duration and magnitude of venting or flaring	See Justification Form> In this case, the steps taken to limit duration and magnitude of flaring was for Oxy production techs to quickly respond to the compression equipment alarm on USA sales gas compressor #1 and take the immediate steps to attempt to correct the issue in an effort stop the slight venting coming off the pressure relief valve on USA sales gas compressor #1. Oxy production techs efforts to perform immediate troubleshooting actions were unsuccessful and therefore, the malfunctioning compressor unit had to be shut down, triggering a flaring event. In addition to shutting USA sales gas compressor unit #1, OXY routed all the stranded sales gas to a flare with a 98% combustion efficiency in order to lessen emissions as much as possible while also shutting in five (5) wells in effort to reduce the volume of flaring to minimize emissions. The flare is regularly monitored to ensure the flame is lit and meeting opacity requirements. In order to correct the malfunctioning of USA sales gas compressor unit #1, OXY contacted the compressor owner, USA Compression, and requested a mechanic be sent to repair gas sales compressor unit #1 as soon as possible. Compressor mechanic, upon arrival, which took some time to arrive to the facility due to the company is short-staffed, inspected the unit and to determined the malfunctioning cause to be a faulty pressure relief valve.
Corrective actions taken to eliminate the cause and reoccurrence of venting or flaring	See Justification Form> Oxy cannot take any corrective actions to eliminate the cause and potential reoccurrence of compressor malfunctions as notwithstanding proper gas compressor design and operation, various forms of mechanical or technical issues can be sudden, reasonably unforeseeable and unexpected which can cause compressor unit malfunctions to occur without warning or advance notice. Oxy continually strives to maintain and operate its facility equipment in a manner consistent with good practices for minimizing emissions and reducing the number of emission events. USA sales gas compressor unit # 1 was working as designed and operated normally prior to the sudden and without warning malfunction of the compressor's pressure relief valve. Oxy has a strong and positive compression equipment preventative maintenance program in place. This incident was completely out of OXY's control to prevent from happening as it was determined the malfunction occurred due to a faulty pressure relief valve, yet OXY made every effort to control and minimize emissions as much as possible during this event. The only actions that Oxy can take and handle that is within its control, is to keep continue with its compression equipment preventative maintenance program for this unit.

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CONDITIONS

Action 33315

CONDITIONS

Operator:	OGRID:
OXY USA INC	16696
P.O. Box 4294	Action Number:
Houston, TX 772104294	33315
	Action Type:
	[C-129] Venting and/or Flaring (C-129)

CONDITIONS

Created By	Condition	Condition Date
system	If the information provided in this report requires an amendment, submit a [C-129] Request to Amend Venting and/or Flaring Incident, utilizing your incident number from this event.	6/23/2021