

OXY USA Inc.

Salt Flat CTB

March 2019

**Mass Fraction Conversion  
Produced Water Tank Flash - Speciation**

Basis: 1 lb-mol

Component	Mol %	MW (lb/lb-mol)	Fraction*MW (lb/lb-mol)	Wt %	Component LHV (Btu/scf)	Gas LHV (Btu/scf)
Hydrogen Sulfide (H2S)	0.0010	34.082	0.000341	0.0009	586.8	0.005868
Nitrogen (N2)	0.0000	28.0135	0.000000	0.0000	0	0
Carbon Dioxide (CO2)	0.8064	44.01	0.354897	0.8859	0	0
Methane (CH4)	28.5294	16.042	4.576686	11.4245	909.4	259
Ethane (C2H6)	19.2969	30.069	5.802385	14.4841	1618.7	312
Propane (C3H8)	22.9380	44.096	10.114740	25.2488	2314.9	531
IsoButane (i-C4H10)	6.8480	58.122	3.980195	9.9355	3000.4	205
N-Butane (n-C4H10)	9.4937	58.122	5.517928	13.7740	3010.8	286
IsoPentane (i-C5H12)	4.2778	72.149	3.086390	7.7044	3699	158
N-Pentane (n-C5H12)	2.9643	72.149	2.138713	5.3387	3706.9	110
Other Hexanes	1.5739	86.175	1.356308	3.3857	4403.8	69.31
Heptanes (C7H16)	1.0383	100.202	1.040397	2.5971	5100	52.95
Octanes +	0.5433	114.229	0.620606	1.5492	5796	31.49
n-Hexane (n-C6H14)	1.1446	86.175	0.986359	2.4622	5100	58.37
2,2,4 Trimethylpentane (C8H18)	0.0000	114.229	0.000000	0.0000	5778.8	0
Benzene (C6H6)	0.2055	78.112	0.160520	0.4007	3590.9	7.38
Toluene (C7H8)	0.2612	92.138	0.240664	0.6008	4273.7	11.16
Ethylbenzene (C8H10)	0.0078	106.165	0.008281	0.0207	4970.4	0.3877
Xylenes (C8H10)	0.0709	106.165	0.075271	0.1879	4958.1	3.52
Water (H2O)	0.0000	18.02	0.000000	0.0000	0	0
TOTAL (less H2S)	100.0		40.06	100.0	--	2096

E&P Tanks Water Run Flash Gas - SW Region Case No. 26 - 10 ppmv Hydrogen Sulfide added.

Total HC 99.114  
Total VOC 73.206  
Total HAP 3.672

### VCU FLARING EVENT SPECIFIC JUSTIFICATIONS FORM

**Facility:** Salt Flat CTB and OGS

**Date:** 08/21/2021

**Duration of event:** >8 hours/day

**MCF Flared:** 52

**Start Time:** 12:00 AM

**End Time:** 11:59 PM

**Cause:** Routine Combustion of storage tank vapors using an enclosed combustion device (VCU)

**Method of Flared Gas Measurement:** VCU Meter tracking combusted gas

**Well API Associated with Facility:** 30-015-45080 Salt Flat CC 20 29 Federal Com #031H

**Comments:** No wells were involved with this flaring event as this event is due to combustion of storage tank vapors by an enclosed combustion device which is used routinely at this facility, pursuant to Federal US EPA NSPS OOOO/OOOOa regulations and state air permitting requirements that require the use of such a device to reduce storage tank emissions by 95%.

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

On May 17, 2021, NMOCD issued a notice entitled, "Frequently Asked Questions Regarding the Natural Gas Waste Rules," and states that "... pursuant to 19.15.27.8(G) NMAC, an operator who vents or flares for any reason and that lasts more than 8 hours cumulatively during any 24-hour period must report that event on Form C-129." Combustion of storage tank vapors by this enclosed combustion device is used routinely at this facility pursuant to Federal US EPA NSPS OOOO/OOOOa regulations and state air permitting requirements that require the use of such a device to reduce storage tank emissions by 95%.

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

On May 17, 2021, NMOCD issued a notice entitled, "Frequently Asked Questions Regarding the Natural Gas Waste Rules," and states that "... pursuant to 19.15.27.8(G) NMAC, an operator who vents or flares for any reason and that lasts more than 8 hours cumulatively during any 24-hour period must report that event on Form C-129." Combustion of storage tank vapors by this enclosed combustion device is used routinely at this facility pursuant to Federal US EPA NSPS OOOO/OOOOa regulations and state air permitting requirements that require the use of such a device to reduce storage tank emissions by 95%.

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

On May 17, 2021, NMOCD issued a notice entitled, "Frequently Asked Questions Regarding the Natural Gas Waste Rules," and states that "... pursuant to 19.15.27.8(G) NMAC, an operator who vents or flares for any reason and that lasts more than 8 hours cumulatively during any 24-hour period must report that event on Form C-129." Combustion of storage tank vapors by this enclosed combustion device is used routinely at this facility pursuant to Federal US EPA NSPS OOOO/OOOOa regulations and state air permitting requirements that require the use of such a device to reduce storage tank emissions by 95%.

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**District III**  
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**District IV**  
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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 46404

**QUESTIONS**

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 46404
	Action Type: [C-129] Venting and/or Flaring (C-129)

**QUESTIONS**

<b>Prerequisites</b>	
<i>Any messages presented in this section, will prevent submission of this application. Please resolve these issues before continuing with the rest of the questions.</i>	
Incident Well	[30-015-45080] SALT FLAT CC 20 29 FEDERAL COM #031H
Incident Facility	Not answered.

<b>Determination of Reporting Requirements</b>	
<i>Answer all questions that apply. The Reason(s) statements are calculated based on your answers and may provide additional guidance.</i>	
Was or is this venting and/or flaring caused by an emergency or malfunction	No
Did or will this venting and/or flaring last eight hours or more cumulatively within any 24-hour period from a single event	Yes
Is this considered a submission for a notification of a major venting and/or flaring	Yes, minor venting and/or flaring of natural gas.
<i>An operator shall file a form C-141 instead of a form C-129 for a release that, includes liquid during venting and/or flaring that is or may be a major or minor release under 19.15.29.7 NMAC.</i>	
Was there or will there be at least 50 MCF of natural gas vented and/or flared during this event	Yes
Did this venting and/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
Was the venting and/or flaring within an incorporated municipal boundary or withing 300 feet from an occupied permanent residence, school, hospital, institution or church in existence	No

<b>Equipment Involved</b>	
Primary Equipment Involved	Other (Specify)
Additional details for Equipment Involved. Please specify	VCU Meter tracking combusted gas

<b>Representative Compositional Analysis of Vented or Flared Natural Gas</b>	
<i>Please provide the mole percent for the percentage questions in this group.</i>	
Methane (CH4) percentage	29
Nitrogen (N2) percentage, if greater than one percent	0
Hydrogen Sulfide (H2S) PPM, rounded up	10
Carbon Dioxide (CO2) percentage, if greater than one percent	1
Oxygen (O2) percentage, if greater than one percent	0
<i>If you are venting and/or flaring because of Pipeline Specification, please provide the required specifications for each gas.</i>	
Methane (CH4) percentage quality requirement	Not answered.
Nitrogen (N2) percentage quality requirement	Not answered.
Hydrogen Sulfide (H2S) PPM quality requirement	Not answered.
Carbon Dioxide (CO2) percentage quality requirement	Not answered.
Oxygen (O2) percentage quality requirement	Not answered.

<b>Date(s) and Time(s)</b>	
Date venting and/or flaring was discovered or commenced	08/21/2021
Time venting and/or flaring was discovered or commenced	12:00 AM
Time venting and/or flaring was terminated	11:59 PM
Cumulative hours during this event	24

<b>Measured or Estimated Volume of Vented or Flared Natural Gas</b>	
Natural Gas Vented (Mcf) Details	Not answered.

Natural Gas Flared (Mcf) Details	Cause: Other   Other (Specify)   Natural Gas Flared   Released: 52 Mcf   Recovered: 0 Mcf   Lost: 52 Mcf ]
Other Released Details	Not answered.
Additional details for Measured or Estimated Volume(s). Please specify	VCU Meter tracking combusted gas
Is this a gas only submission (i.e. only significant Mcf values reported)	Yes, according to supplied volumes this appears to be a "gas only" report.

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

<b>Steps and Actions to Prevent Waste</b>	
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	On May 17, 2021, NMOCD issued a notice entitled, "Frequently Asked Questions Regarding the Natural Gas Waste Rules," and states that "... pursuant to 19.15.27.8(G) NMAC, an operator who vents or flares for any reason and that lasts more than 8 hours cumulatively during any 24-hour period must report that event on Form C-129." Combustion of storage tank vapors by this enclosed combustion device is used routinely at this facility pursuant to Federal US EPA NSPS OOOO/OOOOa regulations and state air permitting requirements that require the use of such a device to reduce storage tank emissions by 95%.
Steps taken to limit the duration and magnitude of venting and/or flaring	On May 17, 2021, NMOCD issued a notice entitled, "Frequently Asked Questions Regarding the Natural Gas Waste Rules," and states that "... pursuant to 19.15.27.8(G) NMAC, an operator who vents or flares for any reason and that lasts more than 8 hours cumulatively during any 24-hour period must report that event on Form C-129." Combustion of storage tank vapors by this enclosed combustion device is used routinely at this facility pursuant to Federal US EPA NSPS OOOO/OOOOa regulations and state air permitting requirements that require the use of such a device to reduce storage tank emissions by 95%.
Corrective actions taken to eliminate the cause and reoccurrence of venting and/or flaring	On May 17, 2021, NMOCD issued a notice entitled, "Frequently Asked Questions Regarding the Natural Gas Waste Rules," and states that "... pursuant to 19.15.27.8(G) NMAC, an operator who vents or flares for any reason and that lasts more than 8 hours cumulatively during any 24-hour period must report that event on Form C-129." Combustion of storage tank vapors by this enclosed combustion device is used routinely at this facility pursuant to Federal US EPA NSPS OOOO/OOOOa regulations and state air permitting requirements that require the use of such a device to reduce storage tank emissions by 95%.

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CONDITIONS  
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**CONDITIONS**

Created By	Condition	Condition Date
shelbyschoepf	If the information provided in this report requires an amendment, submit a [C-129] Amend Venting and/or Flaring Incident (C-129A), utilizing your incident number from this event.	9/3/2021