

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

### Sample Information

Sample Information	
Sample Name	OXY__Burton Flats CTB Production__GC2-73019-12
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

**UPSET FLARING EVENT SPECIFIC JUSTIFICATIONS FORM****Facility:** Burton Flats CTB**Date:** 09/01/2021**Duration of event:** 1 Hour**MCF Flared:** 100**Start Time:** 04:30 PM**End Time:** 05:30 PM**Cause:** Compressor Malfunction > Replace Faulty and Broken Hot Valves**Method of Flared Gas Measurement:** Gas Flare Meter**Well API Associated with Facility:** 30-015-43123 Charlie Chocolate 14 15 Federal Com #031H

**Comments:** This upset event was not caused by any wells associated with the facility. 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. Oxy engages in respectable and good facility operation practices while also maintaining its continuous facility equipment preventative maintenance program.

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

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. In this case, Oxy production techs received high 2<sup>nd</sup> interstage pressure compressor alarms, which required immediate attention. Oxy production techs, responding to the compressor unit's rising 2<sup>nd</sup> interstage pressure alarms and in route to the facility, quickly contacted the compressor unit owner, USA Compression, to immediately send out a compressor mechanic to troubleshoot the unit. A USA compression mechanic quickly arrived at the facility and began to immediately inspect the unit before determining that a shutdown of the unit was needed so that he could perform a thorough inspection of the unit to determine exact cause involving the rising 2<sup>nd</sup> interstage pressure malfunction alarms. OXY production techs assisted with shutting down the unit safely and efficiently, which then triggered a flaring event to occur. It was determined that the cause of the 2<sup>nd</sup> interstage pressure rising alarms were due to faulty and broken hot valves. Valves can become faulty and broken suddenly and without warning, regardless of good preventative maintenance practices and programs. USA compressor mechanic replaced the faulty and broken hot valves on the 2<sup>nd</sup> interstage and inspected the compressor unit thoroughly for any other possible reasons the compressor unit might be having rising high interstage pressure yet finding no other cause. After making the necessary valve replacements, the compressor mechanic brought the gas compressor unit back to normal working service. OXY personnel were in place and available at the facility location when compressor unit was returned to working service and flaring ceased. 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 by working safely and diligently to resolve its issues.

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

It is OXY's policy to route all stranded gas to a flare during an unforeseen and unavoidable emergency or malfunction, as the part of the overall process or steps to take to limit duration and magnitude of flaring. Oxy personnel are in

the field 24/7 and can physically see when we are flaring which in turn are communicated to additional Oxy field personnel. Internal OXY procedures ensure that upon gas compressor unit and/or multiple unit shutdown, increased sensor pressure alarms, etc., field production technician personnel are promptly notified, and are instructed to assess the issue as soon as possible in order to take prompt corrective action and minimize emissions. Oxy production technicians must assess whether the issue or circumstance is due to damage and repair is needed, or whether there are other reasons for its cause.

In this case, Oxy production techs, responding to the compressor unit's rising 2<sup>nd</sup> interstage pressure alarms and in route to the facility, quickly contacted the compressor unit owner, USA Compression, to immediately send out a compressor mechanic to troubleshoot the unit, while also assisting in the process to resolve the issue. It was determined that the cause of the 2<sup>nd</sup> interstage pressure rising alarms were due to faulty and broken hot valves. Valves can become faulty and broken suddenly and without warning, regardless of good preventative maintenance practices and programs. USA compressor mechanic replaced the faulty and broken hot valves on the 2<sup>nd</sup> interstage and inspected the compressor unit thoroughly for any other possible reasons the compressor unit might be having rising high interstage pressure yet finding no other cause. After making the necessary valve replacements, the compressor mechanic brought the gas compressor unit back to normal working service. OXY personnel were in place and available at the facility location when compressor unit was returned to working service and flaring ceased.

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

Oxy is limited in the corrective actions to eliminate this type of cause and potential reoccurrence of flaring 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 and/or necessitating compressor units to be shut down for repairs. 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. This facility's USA gas compressor unit was working as designed and operated normally prior to the sudden and without warning rising interstage pressure alarms, necessitating the shutdown of the compressor unit to make repairs. 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 and broken hot valves. Valves can become faulty and broken suddenly and without warning, regardless of good preventative maintenance practices and programs. 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 gas compressor unit.

**District I**  
1625 N. French Dr., Hobbs, NM 88240  
Phone:(575) 393-6161 Fax:(575) 393-0720

**District II**  
811 S. First St., Artesia, NM 88210  
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**District III**  
1000 Rio Brazos Rd., Aztec, NM 87410  
Phone:(505) 334-6178 Fax:(505) 334-6170

**District IV**  
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 49590

**QUESTIONS**

Operator: OXY USA WTP LIMITED PARTNERSHIP P.O. Box 4294 Houston, TX 772104294	OGRID: 192463
	Action Number: 49590
	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	[30-015-43123] CHARLIE CHOCOLATE 14 15 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	Yes
Did or will this venting and/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 venting and/or flaring event	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	Emergency Flare > Compressor Malfunction > Replace Faulty and Broken Hot Valves

<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	75
Nitrogen (N2) percentage, if greater than one percent	2
Hydrogen Sulfide (H2S) PPM, rounded up	0
Carbon Dioxide (CO2) percentage, if greater than one percent	0
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	09/01/2021
Time venting and/or flaring was discovered or commenced	04:30 PM
Time venting and/or flaring was terminated	05:30 PM
Cumulative hours during this event	1

<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: 100 Mcf   Recovered: 0 Mcf   Lost: 100 Mcf ]
Other Released Details	Not answered.
Additional details for Measured or Estimated Volume(s). Please specify	Gas Flare Meter
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
Was notification of downstream activity received by you or your operator	Not answered.
Downstream OGRID that should have notified you or your operator	Not answered.
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	See Justification Form > 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.
Steps taken to limit the duration and magnitude of venting and/or flaring	See Justification Form > It is OXY's policy to route all stranded gas to a flare during an unforeseen and unavoidable emergency or malfunction, as the part of the overall process or steps to take to limit duration and magnitude of flaring. Oxy personnel are in the field 24/7 and can physically see when we are flaring which in turn are communicated to additional Oxy field personnel. Internal OXY procedures ensure that upon gas compressor unit and/or multiple unit shutdown, increased sensor pressure alarms, etc., field production technician personnel are promptly notified, and are instructed to assess the issue as soon as possible in order to take prompt corrective action and minimize emissions. Oxy production technicians must assess whether the issue or circumstance is due to damage and repair is needed, or whether there are other reasons for its cause.
Corrective actions taken to eliminate the cause and reoccurrence of venting and/or flaring	See Justification Form > Oxy is limited in the corrective actions to eliminate this type of cause and potential reoccurrence of flaring 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 and/or necessitating compressor units to be shut down for repairs. 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. This facility's USA gas compressor unit was working as designed and operated normally prior to the sudden and without warning rising interstage pressure alarms, necessitating the shutdown of the compressor unit to make repairs. 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 and broken hot valves. Valves can become faulty and broken suddenly and without warning, regardless of good preventative maintenance practices and programs. 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 gas compressor unit.

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CONDITIONS  
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	Action Number: 49590
	Action Type: [C-129] Venting and/or Flaring (C-129)

**CONDITIONS**

Created By	Condition	Condition Date
marialuna	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.	9/16/2021