ENERGY TRANSFER

Meter Analysis Summary Report

Contract Month: **03/01/2021**

Meter Num: **63436**
Meter Name: WEST DOLLARHIDE DEVONIAN CDP

Energy Basis:	**Dry**	Effective Date:	**1/1/21 7:00**	C5P:	**1.60**
Press Base:	**14.73**	Valid Thru:	**1/18/38 21:14**	C6P:	**0.77**
Contract Hour:	**7**			C5P_GPM:	**0.60**
		Sample Date:	**1/18/2021**	C6P_GPM:	**0.29**
Gravity:	**1.4622**	Analyzed Date:	**1/26/2021**		
HV Dry:	**325.1**	Sample Press:	**55.4**		
HV Sat:	**325.0**	Sample Temp:	**37.9**		
HV As-Delivered:	**325.1**				

	Mol %	GPM
Methane (C1):	5.6976	
Ethane (C2):	2.8203	0.7586
Propane (C3):	3.3385	0.9251
i-Butane (iC4):	0.3645	0.1200
n-Butane (nC4):	1.5804	0.5011
i-Pentane (iC5):	0.3323	0.1222
n-Pentane (nC5):	0.4980	0.1816
Hexane (C6):	0.6674	0.2929
Heptane (C7):		
Octane (C8):		
Nonane (C9):		
Decane (C10):		
Nitrogen:	1.7866	
CO2:	81.0738	
H2S:	0.0983	
H2O:	1.7424	
HE:		
H2:		
	100.0000	2.9527

3/29/2021 11:13:41 AM

WDDU VENTING EVENT SPECIFIC JUSTIFICATIONS FORM

Facility: West Dollarhide Devonian Unit Battery **Vent Date:** 06/13/2021
Duration of event: >8 hours/day **MCF Vented:** 113
Start Time: 12:00 AM **End Time:** 11:59 PM
Cause: Downstream Activity Issue > Enterprise > 3rd Party Operator Gas System Service Pipeline Restrictions
Method of Flared Gas Measurement: Vent Gas Meter

Comments: The emissions event was caused by the unforeseen, unexpected, sudden, and unavoidable interruption, restriction or complete shut-in of a gas pipeline by a third-party pipeline operator, which impacted Oxy's ability to send gas to a third-party gas pipeline. This interruption, restriction or complete shut-in of the gas pipeline by a third-party pipeline operator is downstream of Oxy's custody transfer point and out of Oxy's control to avoid or prevent from happening and did not stem from any of Oxy's upstream facility activity that could have been foreseen and avoided, and could not have been avoided by good design, operation, and preventative maintenance practices.

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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."

Third-party pipeline operator, Energy Transfer, continually has unexpected and reasonably unforeseeable gas flow pressure limits restrictions on their gas service system pipeline, which is downstream of OXY's custody point and control. Energy Transfer's gas pressure limit pipeline restriction greatly impacts Oxy's ability to push its gas into their sales gas service system pipeline.

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."

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. In this circumstance, the sales gas is too rich in CO2 to burn via a flare, therefore the sales gas is vented, yet solely when Energy Transfer has unexpected and reasonably unforeseeable gas flow pressure limits restrictions on their gas service system pipeline, which is downstream of OXY's custody point and control. Energy Transfer's gas flow pressure limit pipeline restriction greatly impacts Oxy's ability to push its gas into their sales gas service pipeline. Venting does not occur until Energy Transfer begins restricting their gas service volume to Oxy and ceases when Energy Transfer resumes normal working service with no gas flow pressure limit restrictions.

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."

Oxy cannot take any corrective actions to eliminate the cause and potential reoccurrence of an Energy Transfer gas flow pipeline restriction or shut-in, as this control issue is downstream of Oxy's custody transfer point and out of Oxy's control to avoid or prevent from happening or reoccurring.

Released to Imaging: 11/19/2021 10:35:24 AM

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

QUESTIONS

Action 62781

QUESTIONS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 62781
	Action Type: [C-129] Venting and/or Flaring (C-129)

QUESTIONS

Prerequisites	
Any messages presented in this section, will prevent submission of this application. Please resolve these issues before continuing with the rest of the questions.	
Incident Well	*Not answered.*
Incident Facility	**[fAPP2127064958] W DOLLARHIDE DEV UNIT BATTERY**

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 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 venting and/or flaring event	**Yes, minor venting and/or flaring of natural gas.**
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.	
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

Equipment Involved	
Primary Equipment Involved	Other (Specify)
Additional details for Equipment Involved. Please specify	Vent Gas Meter - The emissions event was caused by the unforeseen, unexpected, sudden, and unavoidable interruption, restriction or complete shut-in of a gas pipeline by a third-party pipeline operator, which impacted Oxy's ability to send gas to a third-party gas pipeline. This interruption, restriction or complete shut-in of the gas pipeline by a third-party pipeline operator is downstream of Oxy's custody transfer point and out of Oxy's control to avoid or prevent from happening and did not stem from any of Oxy's upstream facility activity that could have been foreseen and avoided, and could not have been avoided by good design, operation, and preventative maintenance practices.

Representative Compositional Analysis of Vented or Flared Natural Gas	
Please provide the mole percent for the percentage questions in this group.	
Methane (CH4) percentage	6
Nitrogen (N2) percentage, if greater than one percent	2
Hydrogen Sulfide (H2S) PPM, rounded up	983
Carbon Dioxide (C02) percentage, if greater than one percent	81
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 and/or flaring was discovered or commenced	06/13/2021
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

Measured or Estimated Volume of Vented or Flared Natural Gas	
Natural Gas Vented (Mcf) Details	*Not answered.*
Natural Gas Flared (Mcf) Details	Cause: Other | Other (Specify) | Natural Gas Flared | Released: 113 Mcf | Recovered: 0 Mcf | Lost: 113 Mcf]
Other Released Details	*Not answered.*
Additional details for Measured or Estimated Volume(s). Please specify	Vent Gas 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.**

Venting or Flaring Resulting from Downstream Activity	
Was or is this venting and/or flaring a result of downstream activity	Yes
Was notification of downstream activity received by you or your operator	No
Downstream OGRID that should have notified you or your operator	[316048] ENERGY TRANSFER PARTNERS, LP
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.*

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	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." Third-party pipeline operator, Energy Transfer, continually has unexpected and reasonably unforeseeable gas flow pressure limits restrictions on their gas service system pipeline, which is downstream of OXY's custody point and control. Energy Transfer's gas pressure limit pipeline restriction greatly impacts Oxy's ability to push its gas into their sales gas service system pipeline.
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." 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. In this circumstance, the sales gas is too rich in CO2 to burn via a flare, therefore the sales gas is vented, yet solely when Energy Transfer has unexpected and reasonably unforeseeable gas flow pressure limits restrictions on their gas service system pipeline, which is downstream of OXY's custody point and control. Energy Transfer's gas flow pressure limit pipeline restriction greatly impacts Oxy's ability to push its gas into their sales gas service pipeline. Venting does not occur until Energy Transfer begins restricting their gas service volume to Oxy and ceases when Energy Transfer resumes normal working service with no gas flow pressure limit restrictions.
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." Oxy cannot take any corrective actions to eliminate the cause and potential reoccurrence of an Energy Transfer gas flow pipeline restriction or shut-in, as this control issue is downstream of Oxy's custody transfer point and out of Oxy's control to avoid or prevent from happening or reoccurring.

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	Action Number: 62781
	Action Type: [C-129] Venting and/or Flaring (C-129)

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.	11/19/2021