



ENERGY TRANSFER

# Meter Analysis Summary Report

Contract Month: **03/01/2021**Meter Num: **63436**

Meter Name: WEST DOLLARHIDE DEVONIAN CDP

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

| 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:              |          |        |
|                  | <hr/>    | <hr/>  |
|                  | 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:** 06/23/2021

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

**MCF Vented:** 140

**Start Time:** 12:00 AM

**End Time:** 11:59 PM

**Cause:** Downstream Activity Issue > Enterprise > 3<sup>rd</sup> 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.

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.

**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**

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**District IV**

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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 62864

**QUESTIONS**

|                                                                    |                                                        |
|--------------------------------------------------------------------|--------------------------------------------------------|
| Operator:<br>OXY USA INC<br>P.O. Box 4294<br>Houston, TX 772104294 | OGRID:<br>16696                                        |
|                                                                    | Action Number:<br>62864                                |
|                                                                    | Action Type:<br>[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 additional 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 (CO2) percentage, if greater than one percent | 81  |
| Oxygen (O2) 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 Sulfide (H2S) PPM quality requirement      | Not answered. |
| Carbon Dioxide (CO2) percentage quality requirement | Not answered. |
| Oxygen (O2) percentage quality requirement          | Not answered. |

**Date(s) and Time(s)**

|                                                         |            |
|---------------------------------------------------------|------------|
| Date venting and/or flaring was discovered or commenced | 06/23/2021 |
| 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: 140 Mcf   Recovered: 0 Mcf   Lost: 140 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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CONDITIONS  
  
Action 62864

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|                                                                    |                                                        |
|--------------------------------------------------------------------|--------------------------------------------------------|
| Operator:<br>OXY USA INC<br>P.O. Box 4294<br>Houston, TX 772104294 | OGRID:<br>16696                                        |
|                                                                    | Action Number:<br>62864                                |
|                                                                    | Action Type:<br>[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     |