

**EVENT SPECIFIC JUSTIFICATIONS FORM****Facility:** North Hobbs Unit**Start Date:** 12/01/2021 @ 09:34 AM**End Date:** 12/01/2021 @ 09:42 AM**Cause:** The North Plant flared due to "H" Train shutting down due to a leaking bull plug on the cylinder.**Duration of event:** 0:08 hours**Method of Flared Gas Measurement:** Flare Meter

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**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 ensure flame is lit and meeting opacity requirements.

This event was a sudden and unforeseeable compressor malfunction of the North Plant "H" Compressor Unit due to a leaking bull plug found on a cylinder. Oxy plant operators were alerted to the malfunction initially when they received an alarm in the control room before the unit was shut down. The lead operator sent the outside operator to go outside and investigate the reason for the alarm. The outside operator found that there was a leak on the cylinder due to a leaking bull plug. Oxy operators went out to investigate the leak and have it repaired. The leak was determined that the unit had to be shut down for repair and could not be repaired online. OXY operator shut down the unit, and this shut down of the malfunctioning compressor unit triggered a flaring event. After thoroughly inspecting the compressor unit, Oxy operators determined the cause of the leak was due to a leaking bull plug on a cylinder. Oxy operators repaired and thoroughly inspected the compressor for any other possible reasons the compressor coolant could be showing an alarm. After inspecting and troubleshooting the compressor unit, the compressor mechanic brought the 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.

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 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 ensure flame is lit and meeting opacity requirements.

In this case, the steps taken to limit duration and magnitude of flaring was for Oxy Operators to quickly respond to the compression equipment malfunction alarms. An Oxy operator quickly arrived at the facility and began to immediately inspect the unit and read levels and alarms. Oxy operators determined that the compressor unit would need to be shut down so that he could perform a thorough inspection of the unit to determine the exact cause of the leak involving the alarm. OXY operators assisted with shutting down the unit, and this shut down of the malfunctioning compressor unit triggered a flaring event. In addition to shutting down "H" Train, OXY routed all the stranded sales gas to a flare with a 98% combustion efficiency in order to lessen emissions as much as possible. The flare is regularly monitored to ensure the flame is lit and meeting opacity requirements. After thoroughly inspecting the malfunctioning compressor unit. Oxy operators then inspected the unit for any other possible reasons the compressor unit might be getting an alarm. After inspecting and troubleshooting the compressor unit, the compressor mechanic brought the unit back to normal 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. 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 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. The North Hobbs Unit "H" Compressor was working as designed and operated normally prior to the sudden and without warning malfunction of the compressor unit. 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/or broken bull plug. Over time attachments and/or fittings could result in a leak 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 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  
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

**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**

DEFINITIONS

Action 65623

**DEFINITIONS**

Operator: OCCIDENTAL PERMIAN LTD P.O. Box 4294 Houston, TX 772104294	OGRID: 157984
	Action Number: 65623
	Action Type: [C-129] Venting and/or Flaring (C-129)

**DEFINITIONS**

For the sake of brevity and completeness, please allow for the following in all groups of questions and for the rest of this application:

- this application's operator, hereinafter "this operator";
- venting and/or flaring, hereinafter "vent or flare";
- any notification or report(s) of the C-129 form family, hereinafter "any C-129 forms";
- the statements in (and/or attached to) this, hereinafter "the statements in this";
- and the past tense will be used in lieu of mixed past/present tense questions and statements.

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QUESTIONS

Action 65623

**QUESTIONS**

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	Action Number: 65623
	Action Type: [C-129] Venting and/or Flaring (C-129)

**QUESTIONS**

<b>Prerequisites</b>	
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	[fKJ1517634129] NORTH HOBBS UNIT RCF/WIB

<b>Determination of Reporting Requirements</b>	
Answer all questions that apply. The Reason(s) statements are calculated based on your answers and may provide additional guidance.	
Was this vent or flare caused by an emergency or malfunction	Yes
Did this vent or flare last eight hours or more cumulatively within any 24-hour period from a single event	No
Is this considered a submission for a vent or flare 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 at least 50 MCF of natural gas vented and/or flared during this event	Yes
Did this vent or flare result in the release of <b>ANY</b> 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 vent or flare 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	Not answered.
Additional details for Equipment Involved. Please specify	Not answered.

<b>Representative Compositional Analysis of Vented or Flared Natural Gas</b>	
Please provide the mole percent for the percentage questions in this group.	
Methane (CH4) percentage	4
Nitrogen (N2) percentage, if greater than one percent	0
Hydrogen Sulfide (H2S) PPM, rounded up	7,860
Carbon Dioxide (CO2) percentage, if greater than one percent	0
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.

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QUESTIONS, Page 2

Action 65623

QUESTIONS (continued)

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QUESTIONS

Date(s) and Time(s)	
Date vent or flare was discovered or commenced	12/01/2021
Time vent or flare was discovered or commenced	09:34 AM
Time vent or flare was terminated	09:42 AM
Cumulative hours during this event	0

Measured or Estimated Volume of Vented or Flared Natural Gas	
Natural Gas Vented (Mcf) Details	Not answered.
Natural Gas Flared (Mcf) Details	Not answered.
Other Released Details	Cause: Equipment Failure   Fitting   Natural Gas Flared   Released: 100 Mcf   Recovered: 0 Mcf   Lost: 100 Mcf ]
Additional details for Measured or Estimated Volume(s). Please specify	Not answered.
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 this vent or flare a result of downstream activity	No
Was notification of downstream activity received by this operator	Not answered.
Downstream OGRID that should have notified this operator	Not answered.
Date notified of downstream activity requiring this vent or flare	Not answered.
Time notified of downstream activity requiring this vent or flare	Not answered.

Steps and Actions to Prevent Waste	
For this event, this operator could not have reasonably anticipated the current event and it was beyond this operator's control.	True
Please explain reason for why this event was beyond this 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.
Steps taken to limit the duration and magnitude of vent or flare	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.
Corrective actions taken to eliminate the cause and reoccurrence of vent or flare	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.

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ACKNOWLEDGMENTS

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**ACKNOWLEDGMENTS**

<input checked="" type="checkbox"/>	I acknowledge that I am authorized to submit a <i>Venting and/or Flaring</i> (C-129) report on behalf of this operator and understand that this report can be a <b>complete</b> C-129 submission per 19.15.27.8 and 19.15.28.8 NMAC.
<input checked="" type="checkbox"/>	I acknowledge that upon submitting this application, I will be creating a new incident file (assigned to this operator) to track any C-129 forms, pursuant to 19.15.27.7 and 19.15.28.8 NMAC and understand that this submission meets the notification requirements of Paragraph (1) of Subsection G and F respectively.
<input checked="" type="checkbox"/>	I hereby certify the statements in this report are true and correct to the best of my knowledge and acknowledge that any false statement may be subject to civil and criminal penalties under the Oil and Gas Act.
<input checked="" type="checkbox"/>	I acknowledge that the acceptance of any C-129 forms by the OCD does not relieve this operator of liability should their operations have failed to adequately investigate, report, and remediate contamination that poses a threat to groundwater, surface water, human health, or the environment.
<input checked="" type="checkbox"/>	I acknowledge that OCD acceptance of any C-129 forms does not relieve this operator of responsibility for compliance with any other applicable federal, state, or local laws and/or regulations.

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CONDITIONS

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**CONDITIONS**

Created By	Condition	Condition Date
ralvarado	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.	12/8/2021