

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&amp;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:** 1/6/2022

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

**MCF Flared:** 63

**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 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**

DEFINITIONS

Action 72326

**DEFINITIONS**

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 72326
	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

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**QUESTIONS**

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 72326
	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	Not answered.
Incident Facility	[fAPP2126563666] SALT FLAT CTB

<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 this vent or flare caused by an emergency or malfunction	No
Did this vent or flare last eight hours or more cumulatively within any 24-hour period from a single event	Yes
Is this considered a submission for a vent or flare 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 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 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 vent or flare within an incorporated municipal boundary or within 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 - 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%.

<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.

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QUESTIONS, Page 2

Action 72326

**QUESTIONS (continued)**

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**QUESTIONS**

<b>Date(s) and Time(s)</b>	
Date vent or flare was discovered or commenced	01/06/2022
Time vent or flare was discovered or commenced	12:00 AM
Time vent or flare 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: 63 Mcf   Recovered: 0 Mcf   Lost: 63 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 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.

<b>Steps and Actions to Prevent Waste</b>	
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	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 vent or flare	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 vent or flare	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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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  
 Action 72326

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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.	1/13/2022